

GEORGE FEULNER
Plaintiff

vs

M. A. KIRKLIN
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW No. 1475

Comes the defendant in the above styled cause
and for pleas to the complaint heretofore filed against him
therein, and to each count thereof, separately and severally,
sets down and assigns the following separate and several
pleas, to-wit:

1. Not guilty.
2. In short, by consent, the general issue.

W. H. Hamilton & Son
Attorneys for Defendant

RECORDED

FILED

MAR 16 1950

ALICE J. DUCK, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon M. A. Kirklin, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of George Feulner.

WITNESS my hand this 8 day of March, 1950.

Clerk

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GEORGE FEULNER	Ø	IN THE CIRCUIT COURT OF
PLAINTIFF	Ø	BALDWIN COUNTY, ALABAMA
VS.	Ø	AT LAW
M. A. KIRKLIN	Ø	
DEFENDANT	Ø	

1.

The Plaintiff claims of the Defendant ONE THOUSAND (\$1000.00) DOLLARS, as damages, for that heretofore on to-wit, November 15th, 1949, the Plaintiff was operating his automobile along highway 90, a public highway in Baldwin County, Alabama, at a point approximately one-half mile East of Tensaw River, in Baldwin County, Alabama; that at said time and place the Defendant negligently drove an automobile which he was driving along said highway at said time and place into or against the automobile of the Plaintiff's and as a proximate result of said negligence on the part of the Defendant, at said time and place, the automobile of the Plaintiff's was damaged as follows:

Right fender bent and broken; right front wheel bent; right front door bent and broken; right rear door bent and broken; right side of body bent; glasses broken; right rear fender bent; rear axel broken; frame bent; right rear wheel bent.

All to the damage of the Plaintiff, hence this suit.

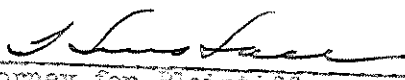
2.

That Plaintiff claims of the Defendant the sum of ONE THOUSAND (\$1000.00) DOLLARS, as damages for that heretofore on to-wit, November 19th, 1949, the Plaintiff was operating his automobile along Highway 90, a public highway in Baldwin County, Alabama, at a point approximately one-half mile East of Tensaw River, in Baldwin County, Alabama; that at said time and place the Defendant negligently caused an automobile, which

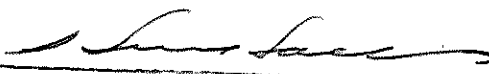
he was driving along said highway, at said time and place to collide with the automobile of the Plaintiff's, and as a proximate result of the said negligence of the Defendant, at said time and place the automobile of the Plaintiff's was damaged as follows:

Right fender bent and broken; right front wheel bent; right front door bent and broken; right rear door bent and broken; right side of body bent; glasses broken; right rear fender bent; rear axel broken; frame bent; right rear wheel bent.

All to the damage of the Plaintiff, hence this suit.


Attorney for Plaintiff

The Plaintiff demands a trial by jury.


Attorney for Plaintiff

Defendant's Address:
53 North Wilson Avenue
Prichard,
Mobile County, Alabama

693 1473 314
/E
RECORDED

GEORGE FEULNER
Plaintiff
Vs
M. A. KIRKLIN
Defendant

SUMMONS AND COMPLAINT

From the law office of
H. M. Hall
Bay Minette, Alabama

Received in Sheriff's Office
this 9 day of March 1950
TAYLOR WILKINS, Sheriff

Received 19th Day of March 1950
and on 13th Day of March 1950
I served a copy of the within & C.
on W. H. Holcombe
by service on W. H. Holcombe, Sheriff
By W. B. Shackleton, J.A.

Filed 3-8-50
W. B. Shackleton
clerk

HAMILTONS & DENNISTON

ATTORNEYS & COUNSELLORS AT LAW

MOBILE 13, ALABAMA

J. GAILLARD HAMILTON
THOMAS A. HAMILTON
PETER BRYCE HAMILTON
ROBERT P. DENNISTON
HARRY H. RIDDICK

March 15, 1950

Hon. Alice J. Duck, Register
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

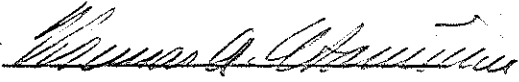
Please file the enclosed pleas for us in the
case George Feulner, Plaintiff versus M. A. Kirklin,
Defendant, being case No. 1473 on your Circuit Court
Law Docket.

Thanking you, we are

Yours respectfully,

HAMILTONS & DENNISTON

TAH:lh
4625
Encl.

By 

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AND
THE TILDEN FOUNDATION

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