

1697

JOHN R. HOLTE,
Plaintiff

vs

EDWARD J. MAHRHEX
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Comes the Defendant and for answer to count one of said complaint
says:

COUNT ONE

Not guilty.


Attorney for Defendant

FILED
JAN 10 1968
BALDWIN COUNTY
ALABAMA

FILED
JAN 10 1968
BALDWIN COUNTY
ALABAMA

RECORDED
101697

JOHN R. WHITE

Plaintiff

vs

EDWARD J. HARRISON

Defendant

ANSWER

FILED

Oct 27 1951

ALICE J. DUCK, Clerk

From the law offices of
C. Percie Thompson
Day Minette, Alabama

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT . . . LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Edward J. Hanranek to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of John R. Nolte.

Witness my hand this 29th day of August, 1951.

Alice J. Hanrahan
Clerk

() () () () () () () () () () () () () () ()

-COMPLAINT -

JOHN R. NOLTE,

Plaintiff

)(

-vs-

)(

IN THE CIRCUIT COURT OF

)(

BALDWIN COUNTY, ALABAMA

EDWARD J. HANRANEK

)(

LAW SIDE

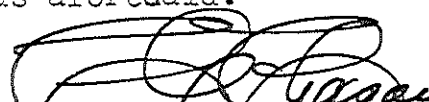
Defendant

)(

- COUNT 1 -

The Plaintiff claims of the Defendant the sum of Three Hundred Ten Dollars and Sixty-nine cents (\$310.69) as damages for that heretofore on to-wit September 5, 1950, the Plaintiff's automobile was being operated along and upon a public street in the Town of Fairhope, Alabama on to-wit Fairhope Avenue, where he had a right to be, and while said automobile was being operated and driven along the said Fairhope, Avenue, an automobile which was being driven by the Defendant ran upon, over, or against the automobile of the Plaintiff, causing damages and injury to the Plaintiff's automobile: The door, the side panels, the fenders, a wheel, and other parts of Plaintiff's automobile were broken, bent, smashed, or otherwise damaged and injured, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the

Defendant, in that he negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the Plaintiff and as a proximate consequence thereof, the plaintiff's automobile was damaged and injured as aforesaid.


Attorney for Plaintiff

Defendant's Address
Fairhope, Alabama

Received in Sheriff's Office
this 29 day of Aug, 1951
TAYLOR WILKINS, Sheriff

701697
RECORDED
SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

John R. Nolte
Plaintiff

vs

Edward J. Hanranek
Defendant

Filed this the 29th day of August,
1951.

Richard W. Smith
Clerk

Executed this the 18 day of Sept,
1951 by leaving a copy hereof
with the defendant.

Edward J. Hanranek
Taylor Wilkins
Sheriff

By Edgar Steadham

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

1697