

17210

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Aaron Bishop and Clarence Bishop to appear within thrity 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 William E. West, Jr.

Witness my hand this 26th day of October, 1951.

Henry J. ...
Clerk.

COMPLAINT

WILLIAM E. WEST, JR.,	¶	
Plaintiff,	¶	IN THE CIRCUIT COURT OF
vs.	¶	BALDWIN COUNTY, ALABAMA
AARON BISHOP and CLARENCE BISHOP,	¶	LAW SIDE.
Defendants.	¶	

COUNT ONE:

The Plaintiff claims of the Defendant, Aaron Bishop, the sum of Five Hundred Dollars (\$500.00) as damages, for that heretofore, on to-wit, the 4th day of July, 1951, the Defendant, acting by and through Clarence Bishop, as his servant, agent or employee, so negligently operated a motor vehicle on Fairhope Avenue, at a point to-wit, 100 feet East of the intersection thereof with Summit Street within the corporate limits of Fairhope, Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, upon or against the motor vehicle of the Plaintiff, which he was then and there operating on said Fairhope Avenue, a public street in the City of Fairhope, Alabama, and as a proximate result and consequence of the said negligence of the Defendant's agent, servant or employee, while acting within the line and scope of his employment the said motor vehicle of the Plaintiff was badly bent, smashed, broken and otherwise damaged and the Plaintiff was deprived for the use thereof for

a long period of time, all to the Plaintiff's damage aforesaid, wherefore Plaintiff brings this suit and asks judgment in his favor in the above amount.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore, on to-wit, the 4th day of July, 1951, the Defendant Clarence Bishop, while acting within the line and scope of his employment as agent, servant or employee of the Defendant, Aaron Bishop, so negligently operated a motor vehicle on Fairhope Avenue, at a point to-wit, 100 feet East of the intersection thereof with Summit Street within the corporate limits of Fairhope, Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, upon or against the motor vehicle of the Plaintiff, which he was then and there operating on said Fairhope Avenue, a public street in the City of Fairhope, Alabama, and as a proximate result and consequence of the said negligence of the Defendant's agent, servant or employee, while acting within the line and scope of his employment the said motor vehicle of the Plaintiff was badly bent, smashed, broken and otherwise damaged and the Plaintiff was deprived for the use thereof for a long period of time all to the Plaintiff's damage aforesaid, wherefore Plaintiff brings this suit and asks judgment in his favor in the above amount.

COUNT THREE:

The Plaintiff claims of the Defendant, Clarence Bishop, the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore, on to-wit, the 4th day of July, 1951, the Defendant Clarence Bishop, so negligently operated a motor vehicle on Fairhope Avenue, at a point to-wit, 100 feet East of the intersection thereof with Summit Street, within the corporate limits of Fairhope, Baldwin County, Alabama, as to cause or allow said motor vehicle to run into or against the motor vehicle of the Plaintiff, which he was then and there operating on said Fairhope Avenue, a public street in the City of Fairhope, Alabama, and as a proximate result and consequence of said negligence of the Defendant, Clarence Bishop, the motor vehicle

of the Plaintiff was badly bent, smashed, broken and otherwise damaged, and the Plaintiff was deprived for the use thereof for a long period of time, all to the Plaintiff's damage as aforesaid, wherefore Plaintiff brings this suit and asks judgment in his favor in the above amount.

SMITH, HAND, ARENDALL & BEDSOLE
and
CHASON & STONE

By: _____
Attorneys for Plaintiff.

Defendants' address:

Route I, Box 184
Fairhope, Alabama.

SUMMONS AND COMPLAINT

Executed _____ 19 ____
by serving copy of within Summons and
Complaint on

Aaron Bishop Oct. 31, 1951
Clarence Bishop Oct. 30, 1951

Taylor Wilkins Sheriff
By V. F. Hall Deputy Sheriff

WILLIAM E. WEST, JR.

Plaintiff,

vs.

AARON BISHOP and CLARENCE
BISHOP,

Defendants.

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

Filed: October 26th, 1951.

Amie J. Leach
clerk

RECORDED

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA