

1740

You are hereby commanded to summon MARVIN PARKER, 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 HAZEL KIMMON, by next friend KEN KIMMON.

Register.

10.

The Plaintiff claims of the Defendant the sum of TWO THOUSAND NINE HUNDRED AND NINETY (\$2,990.00) DOLLARS AS DAMAGES FOR that heretofore, on to-wit, December 2, 1950, Marvin Parker, while operating an automobile

truck upon and along a public highway, to-wit U. S. Highway 90 in Baldwin County near Robertsdale, Alabama and at said time and place said Defendant negligently caused or negligently allowed an automobile truck which he operated to be parked on said public highway without taking the legal and proper precautions, thereby allowing an automobile to run upon or against said automobile truck. The approximate result of said negligent action being personal injuries to the said Hazel Kinnon, age 15, a passenger in said automobile truck, whereby she suffered serious cuts to her ear, along her face, chin, nose and throat and a broken bone, all of which being the approximate cause of said Defendant's action.

And Plaintiff further avers that the Defendant Marvin Parker was on the date of said collision, to-wit, the 2nd day of December, 1950, a non-resident of the State of Alabama, and that the present Post Office address of said Defendant is McHenry, Mississippi, and the Plaintiff prays that service of process upon the Defendant Marvin Parker may be had in accordance with the provisions of Code 1940, Title 7, Section 199.


Attorney for the Plaintiff.

FILED
1951 DEC 10
HON. CLERK
U.S. DIST. CT.
SOUTHERN DIST. OF ALA.

FILED
NOV 20 1951
ALICE L. DUCK, Clerk

[Handwritten signature]
Report for the Attorney
General

had in accordance with the provisions of Code 1910, Title 1, Section 100,
brought that matter of record from the Defendant William Jones, and he
admitted of said Defendant in 1910, 1911, 1912, and the 1913
a statement of the State of Virginia, and that the person long known
on the date of said admission, to-wit, the 2nd day of December, 1920,
and William Jones, was the Defendant William Jones, and
all of which being the substance of said Defendant's answer,
to his own filing in 1920, and was and shall be a proper basis
thereon in said admission, and the said answer and
action being deemed sufficient to the said State of Virginia, and the
admission and answer being true. The substance of said admission
and answer, however, should appear in answer to the fact or
admitted to be denied on said bill of particulars, and the fact
negatively stated on said bill of particulars, and the fact
concerning the Defendant's answer and the fact and the Defendant
shall upon and along a bill of particulars, to-wit, U. S. District No. 10 in Virginia

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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WITNESS my hand, this _____ day of _____, 1951.

Register.

HAZEL KINMON, by next
friend, KEN KINMON

PLAINTIFF

VS

MARVIN PARKER

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

COUNT ONE

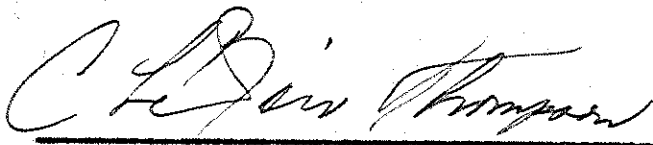
The Plaintiff claims of the Defendant the sum of TWO THOUSAND NINE HUNDRED AND NINETY (\$2,990.00) DOLLARS as damages for that heretofore, on to-wit, December 2, 1950, Marvin Parker, while operating an automobile truck upon and along a public highway, to-wit U. S. Highway 90 in Baldwin County near Robertsedale, Alabama and at said time, and place said Defendant wantonly caused or wantonly allowed an automobile truck which he operated to be parked on said public highway without taking the legal and proper precautions, thereby allowing an automobile to run upon or against said automobile truck. The approximate result of said wanton action being personal injuries to the said Hazel Kinmon, age 15, a passenger in said automobile truck, whereby she suffered serious cuts to her ear, along her face, chin, nose and throat and a broken bone, all of which being the approximate cause of said Defendant's action.

COUNT TWO

The Plaintiff claims of the Defendant the sum of TWO THOUSAND NINE HUNDRED AND NINETY (\$2,990.00) DOLLARS AS DAMAGES FOR that heretofore, on to-wit, December 2, 1950, Marvin Parker, while operating an automobile

truck upon and along a public highway, to-wit U. S. Highway 90 in Baldwin County near Robertsdale, Alabama and at said time and place said Defendant negligently caused or negligently allowed an automobile truck which he operated to be parked on said public highway without taking the legal and proper precautions, thereby allowing an automobile to run upon or against said automobile truck. The approximate result of said negligent action being personal injuries to the said Hazel Kinmon, age 15, a passenger in said automobile truck, whereby she suffered serious cuts to her ear, along her face, chin, nose and throat and a broken bone, all of which being the approximate cause of said Defendant's action.

And Plaintiff further avers that the Defendant Marvin Parker was on the date of said collision, to-wit, the 2nd day of December, 1950, a non-resident of the State of Alabama, and that the present Post Office address of said Defendant is McHenry, Mississippi, and the Plaintiff prays that service of process upon the Defendant Marvin Parker may be had in accordance with the provisions of Code 1940, Title 7, Section 199.


Attorney for the Plaintiff.

FILED
NOV 30 1951
U.S. DIST. CT.
S.D. MISSISSIPPI

847-68

FILED
NOV 130 1951
ALICE L. DUCK, Clerk

Attorney for the Plaintiff.
[Signature]

had in accordance with the provisions of Code 1940, Title 1, Section 199,
bring that service of process upon the Defendant Martin Foster and to
address of said Defendant is unknown, Maryland, and the Plaintiff
is non-resident of the State of Virginia, and that the present post office
on the date of said collision, to-wit: the 2nd day of December, 1950.

And Plaintiff further avers that the Defendant Martin Foster was
one of which being the approximate cause of said Defendant's motion.
to her car, along her face, arm, nose and thumb and a broken bone
fractured in said automobile crash, whereby she sustained serious and
serious joint personal injuries to the said lower limbs, etc. It is
admitted said automobile crash. The approximate result of said negligent
and proper investigation, thereby allowing an automobile to run down or
obstructed to be parked on said public highway without seeing the injury
negligently caused or negligently allowed an automobile crash which he
County from responsibility, injuries and up said arm and bone said Defendant
frank upon and along a public highway, to-wit: U. S. Highway 30 in Western

STATE OF ALABAMA
BALDWIN COUNTY

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HAZEL KINMON, by next
friend, KEN KINMON

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VS

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AT LAW.

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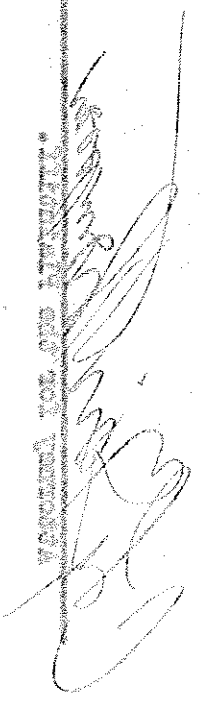
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Attorney for the Plaintiff.

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FILED
NOV 130 1951
ALICE J. DUCK, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

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VS

MARVIN PARKER

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

COUNT ONE

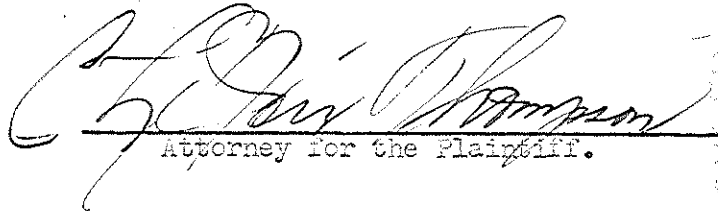
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Attorney for the Plaintiff.

7001748

RECORDED

HAZEL KINKON, by next
friend, KEN KINKON

PLAINTIFF

VS

MARVIN PARKER

DEFENDANT

*Hold until
further notice*

From the law offices of
C. LeNoir Thompson
Bay Minette, Alabama

FILED

NOV 30 1951

ALICE L. DUCK, Clerk