1740

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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 KINMON, by next friend KEN KINMON.

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 Robertsdale, 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 negligemt 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.

C. L. Ben Kimmon
Attorney for the Plaintiff.

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 Essel Kymson, 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 Morris Barker 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 McComb, Mississippi, and the Plaintiff prays that service of process upon the Defendant Morris Barker may be had in accordance with the provisions of Code 1940, Title 7, section 199.

Attorney for the Plaintiff.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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 KINMON, by next friend KEN KINMON.

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

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Register.

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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

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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.

C. L. Dix Thompson

Attorney for the Plaintiff.

ns 1748

FILED
NOV 30 1951
ALICE L. BUCK, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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 KINMON, by next friend KEN KINMON.

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

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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

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COUNT TWO

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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.

701740

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BALDWIN COUNTY

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HAZEL KINMON, by next friend, KEN KINMON PLAINTIFF VS MARVIN PARKER DEFENDANT	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW. NO. _____

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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.

No 1748

RECORDED

HAZEL KINMON, by next
friend, KEN KINMON

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 J. DUCK, Clerk