

1848

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 Chester Merrit and Charles Merritt 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 same, then and there to answer the complaint of Johnny J. Miller.

WITNESS my hand this 16th day of August, 1952.

Dennis J. Leach
Clerk

- COMPLAINT -

JOHNNY J. MILLER,	I	
Plaintiff,	I	
-vs-	I	IN THE CIRCUIT COURT OF
CHESTER MERRITT and	I	BALDWIN COUNTY, ALABAMA
CHARLES MERRITT,	I	LAW SIDE.
Defendants.	I	

COUNT ONE

The Plaintiff claims of the Defendant as damages Five Hundred Dollars (\$500.00) for that he averes that on to-wit:- August 18, 1951, Charles Merritt, the agent, servant or employee of Chester Merritt, while acting within the line or scope of his employment as such agent, servant or employee, negligently ran a Chevrolet truck upon or against the truck of the Plaintiff on Alabama Highway 89 at the community of Elberta, Baldwin County, Alabama, this being a public highway, and as a proximate result and consequence thereof, Plaintiff's truck was severally damaged in that the frame was bent, the right front fender, door, light, radiator, etc. were bent and broken and the vehicle otherwise severally damaged, all to Plaintiff's damage as aforesaid.

COUNT TWO

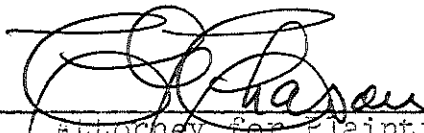
The Plaintiff claims of the Defendant as damages Five Hundred Dollars (\$500.00) for that he averes that on to-wit:- August 18,

1952, Charles Merritt negligently ran a Chevrolet truck upon or against the truck of the Plaintiff on Alabama Highway 89 at the community of Elberta, Baldwin County, Alabama, this being a public highway, and as the proximate result and consequence thereof, Plaintiff's truck was severally damaged in that the frame was bent, the right front fender, door, light, radiator, etc. were bent and broken and the vehicle otherwise severally damaged, all to Plaintiff's damage as aforesaid.



Attorney for Plaintiff

Plaintiff demands trial
by jury.



Attorney for Plaintiff

RECORDED

SUMMONS AND COMPLAINT

JOHNNY J. MILLER,

Plaintiff,

vs.

CHESTER MERRITT and
CHARLES MERRITT,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

FILED

AUG 16 1952

ALICE L. DUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

TAYLOR WILKINS, Sheriff

Executed by leaving a copy
of the within contained
Summons and Complaint with
the Defendant, Chester
Merritt, on this the 25th
of August, 1952.

Taylor Wilkins
Sheriff

Executed by leaving a copy
of the within contained
Summons and Complaint with
the Defendant, Charles
Merritt, on this the 25th
day of August, 1952.

Taylor Wilkins
Sheriff

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