

STATE OF ALABAMA  
BALDWIN COUNTY

1911

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons LONNIE JOHNSON 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 R. J. VINSON.

WITNESS my hand, this 28<sup>th</sup> day of January, 1953.

David J. Leach  
CLERK

R. J. VINSON

PLAINTIFF

VS

LONNIE JOHNSON

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW

1.

The Plaintiff claims of the Defendant as damages the sum of NINE HUNDRED (\$900.00) DOLLARS for that heretofore on to-wit, December 20, 1952, the Plaintiff's automobile while stopped at the intersection of Highway No. 31, a public highway in Baldwin County, Alabama, and the Old Daphne Road, a public Highway in the city of Bay Minette, Baldwin County, Alabama; that at said time and place the Defendant negligently drove an automobile into the automobile of the Plaintiff and as a proximate result of said negligence of the Defendant the Plaintiff suffered the following damages: his left front wheel was damaged; his left front fender was bent and broken; his left front door was bent and broken; his radiator was bent and broken; the front stabilizer was bent and broken; the tire and tube were bursted and torn; his automobile was otherwise damaged; the price of his automobile was seriously diminished; that at the time the Plaintiff was using said automobile in connection with his business and as a proximate result of the said negligence on the part of the Defendant the Plaintiff lost the use of his automobile for to-wit: thirty days, all to the damage of the Plaintiff as aforesaid.

2.

The Plaintiff claims of the Defendant as damages, the sum of NINE HUNDRED (\$900.00) DOLLARS for that heretofore on to-wit, December 20, 1952, the

Plaintiff's automobile while stopped at the intersection of Highway 31 a public highway in Baldwin County, Alabama, and the Old Daphne road, a Public highway in the City of Bay Minette, Baldwin County, Alabama; that at said time and place the Defendant negligently drove an automobile so as to cause it to collide with the automobile of the Plaintiff and as a proximate result of said negligence of the Defendant, the Plaintiff suffered the following damages: his left front wheel was damaged; his left front fender was bent and broken; his left front door was bent and broken; his radiator was bent and broken; the front stabilizer was bent and broken; the tire and tube were bursted and torn; his automobile was otherwise damaged; the price of his automobile was seriously diminished; that at the time the Plaintiff was using said automobile in connection with his business and as a proximate result of the said negligence on the part of the Defendant the Plaintiff lost the use of his automobile for to-wit: thirty days, all to the damages of the Plaintiff as aforesaid.

  
Attorney for the Plaintiff

The Plaintiff demands a trial by jury.

  
Attorney for the Plaintiff

Received in Sheriff's Office  
this 28 day of Jan, 1953  
TAYLOR WILKINS, Sheriff

ceived 28 day of Jan 1953  
d on 9 day of Feb 1953  
erved a copy of the within Summons  
& Complaint

service on Lonnie Johnson

TAYLOR WILKINS, Sheriff  
By N. F. Hall D. S.

NO 194  
RECORDED  
ORIGINAL

R. J. VINSON

PLAINTIFF

VS

LONNIE JOHNSON

DEFENDANT

Sea Ranch

SUMMONS & COMPLAINT

7312

FILED  
JAN 28, 1953  
ALICE J. DUCK, Clerk



Filed 11-17-53  
Airtel was rep  
clerk

11/1  
R. J. VINSON

PLAINTIFF

VS

LONNIE JOHNSON

DEFENDANT

Ø

IN THE CIRCUIT COURT OF

Ø

BALDWIN COUNTY, ALABAMA,

Ø

AT LAW

Ø

Ø

Comes now the Plaintiff in the above styled cause and withdraws his demand for a jury trial and moves the court to ascertain his damages without the intervention of a jury as provided for under Act No. 74 of the Alabama Law passed at the regular session of the 1953 legislature.

WILTERS & BRANTLEY

BY:

W. J. Wilter, Jr.  
Attorney for the Plaintiff

1911

R. J. WINSON

PLAINTIFF

VS

LOWMIE JOHNSON

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW

Comes now the Plaintiff in the above styled cause and withdraws  
his demand for a jury trial and moves the court to ascertain his damages  
without the intervention of a jury as provided for under Act No. 14 of  
the Alabama Law passed at the regular session of the 1923 Legislature.

WINTERS & BRAWLEY

BY: [Signature]  
Attorney for the Plaintiff