

HARFORD PENN,

Plaintiff,

-vs-

BUSTER MANCIA and
CHARLIE F. HOLLINGER,
Jointly and Severally,

Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA.

at LAW

CASE NO.

1952

Plaintiff claims of the Defendants the sum of Five Hundred (\$500.00) Dollars as damages in this, that heretofore, on to-wit: the 29th day of November, 1952, the Defendant Charlie F. Hollinger, the agent, servant or employee of the Defendant Buster Mancía, while acting within the line and scope of his employment as such, so negligently operated a Farmall type tractor northwardly on the Malbis-to-Silver Hill Road at a point approximately thirty yards south of its intersection with the Daphne-to-Loxley Road, both of which are public roads in Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was then being driven in a southwardly direction on said Malbis-to-Silver Hill Road, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged all to the injury of the Plaintiff, hence this suit.


ATTORNEYS FOR PLAINTIFF

STATE OF ALABAMA *
COUNTY OF BALDWIN *

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon BUSTER MANCIA to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of HARFORD PENN.

Witness: Alice J. Duck, Clerk of said Court, this 21st day of March, 1953.

Attest: _____

Alice J. Duck
Clerk.

* * * * *

SHERIFF'S RETURN

Received 21 day of March, 1953, and on 21 day of March, 1953, I served a copy of the within Complaint on Buster Mancie by service on Person.

A. P. Duck
Deputy SHERIFF

STATE OF ALABAMA)
COUNTY OF BALDWIN)

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CHARLIE F. HOLLINGER to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of HARFORD PENN.

Witness: Alice J. Duck, Clerk of said Court, this 21st day of March, 1953.

Attest: Alice J. Duck
Clerk

* * * * *

SHERIFF'S RETURN

Received 21 day of March, 1953, and on 21 day of March, 1953, I served a copy of the within Complaint on Charlie F. Hollinger by service on Person.

W. P. Anderson
Deputy SHERIFF.

NO 1952

Received in Sheriff's Office
this 4 day of Mar 1953
TAYLOR WILKINS, Sheriff

Hartford Penn

vs.

Buster Mancei and
Charlie Hollinger

Executed by
Personal Service

21 - March
1953

R. Van Dyke
Deputy Sheriff

FILED

3-21-53

ALICE J. DUCK, Clerk

PLEAS

HARFORD PENN,

Plaintiff,

VS.

ARTHUR MANCI (BUSTER MANCIA) and
CHARLIE F. HOLLINGER, Jointly and
Severally,

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 1952.

Comes now ARTHUR MANCI (Buster Mancía) and CHARLIE F. HOLLINGER,
Defendants in the above styled cause and for plea to the Complaint filed in
said cause say:

1. Not guilty.

2. The Plaintiff was guilty of negligence which contributed pro-
ximately to the injuries complained of in the Complaint, in that on said day
and date the Plaintiff so negligently operated the automobile he was driving in
a Southerly direction on the Malbis-to-Silverhill Road at a point a few yards
south of its intersection with the Daphne-to-Loxley Road, both of which are
public roads in Baldwin County, Alabama, as to cause or allow said automobile
to collide with or run against the tractor the Defendant, Charlie F. Hollinger,
was driving, which was then being driven in a northerly direction on said
Malbis-to-Silverhill Road, which negligence proximately contributed to the
Plaintiff's alleged damages and injuries.

WILTERS & BRANTLEY

By:

Albert M Brantley
Attorneys for Defendants.

PLEAS

HARFORD PENN,

Plaintiff,

VS.

ARTHUR MANCI (BUSTER MANCIA) and
CHARLIE F. HOLLINGER, Jointly and
Severally,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 1952.

FILED

4-20-53

ALICE J. GIBBS, Clerk

GORDON & JANSEN

ATTORNEYS AT LAW

1607-1610 MERCHANTS NATIONAL BANK BUILDING

MOBILE II, ALABAMA

March 20, 1953

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.

OF COUNSEL:
ROBERT E. GORDON
1325 DAUPHIN STREET

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

We enclose herewith original and two copies of
Summons and Complaint which we wish to file in your
Court.

Please docket this cause, acknowledging receipt
of these papers, and advising us at our expense the
date on which service is accomplished by the Sheriff.

Very truly yours,

GORDON & JANSEN

BY: 

VRJjr/pjb

Encls. 3

Mo 1952

Hartford Penn

vs.

Buster Nance
and Charlie Halliniga

Hanger

3-21-57

Gordon Jansen