

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mattie Burt and Sandra Burt 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 Donald Wilson.

Witness my hand this 5th day of Sept,
1969.

Alice J. Luck
Clerk

DONALD WILSON,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

MATTIE BURT and SANDRA BURT,

X

AT LAW

Defendants.

X

8873

The Plaintiff claims of the Defendants the sum of Six Hundred and Fifty Dollars (\$650.00) as damages for that heretofore on, to-wit, the fifteenth day of November, 1968, at approximately 7:10 P. M. at the intersection of McMillan Avenue and Ninth Street in the City of Bay Minette, Baldwin County, Alabama, the Defendant Sandra Burt, who was then and there the agent, servant or employee of the Defendant Mattie Burt and acting within the line and scope of her authority as such agent, servant or employee at said time and place so negligently operated a motor vehicle as to cause or allow the same to collide with a motor vehicle belonging to the Plaintiff and as a proximate result of the negligence of the said Sandra Burt, the automobile of the Plaintiff was damaged in that both front fenders, the grill, hood, radiator, headlights and

assemblies, parking lights and assemblies, the battery and the frame of the automobile were all bent, damaged or broken to the damage of the Plaintiff in the sum aforesaid, hence this suit.

CHASON, STONE & CHASON

By:

John Earle Chason

FILED

SEP 5 1969

ALICE J. DUCK CLERK
REGISTER

Ex
9-8-69

8872

DONALD WILSON,

Plaintiff,

vs.

MATTIE BURT and SANDRA BURT,
501 Brady Road - Bay Minette
Defendants,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED

SEP 5 1969

ALICE J. DUCK

CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

TAYLOR WILKINS, Sheriff
By *W. A. Wilkins*
D. S.

By service on

Burt

on

Mattie Burt & Sandra

I served a copy of the within

AVC

and on

day of

Sept

1969

Received

5

Sept

1969