

STATE OF ALABAMA)

BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Fred C. Griffin and Juanita Griffin, individually, jointly and severally, 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 Edward Mason, Jr.

Witness my hand this 9th day of May, 1953.

Alice J. Duck
Clerk.

EDWARD MASON, JR.,

Plaintiff,

vs.

FRED C. GRIFFIN and JUANITA
GRIFFIN, individually, jointly
and severally.

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. _____

COUNT ONE

Plaintiff claims of the Defendants, individually, jointly and severally FIVE THOUSAND DOLLARS (\$5,000.00) as damages for that heretofore on, to-wit, the 3rd. day of February, 1953, the Defendants unlawfully and in violation of Title 36, Section 25 of the Code of Alabama, 1940 or other violations of Law or of the rules of the road of the State of Alabama, parked or did leave standing a motor vehicle upon the paved portion of Highway No. 3, North of Foley, Alabama, being a public Highway in the County of Baldwin, State of Alabama; and as a direct and proximate consequence thereof an automobile driven by one Beech, whose name is otherwise known to the Plaintiff was caused to run into, on, over or against another automobile which was being operated by one Peterson, whose name is otherwise known to the Plaintiff, causing the automobile of the said Peterson to run into, on, over or against the automobile of the Plaintiff; and Plaintiff avers that as a direct and proximate result of the said unlawfully parking on the part of the said Defendants as aforesaid his automobile was greatly damaged broken and bent, whereby he was caused to lay out, or become liable for, large sums of money for the repair of said vehicle, to-wit, approximately FIVE HUNDRED DOLLARS (\$500.00). And Plaintiff avers that as a further direct and proximate result of the said unlawfully parking on the part of the said Defendants as aforesaid he was delayed in getting a commission as an officer in the United States Navy whereby he lost a considerable sum of money to which he would have otherwise been entitled as pay as such officer, to-wit, approximately TWO HUNDRED AND FIFTY DOLLARS (\$250.00). And Plaintiff avers as a further direct and proximate result of the said unlawfully parking on the part of the said Defendants as aforesaid he lost the benefits of his New Car Guaranty and his Thousand Mile New Car Check-up Privilege, although said automobile had been driven less than 900 miles at the time of the aforesaid collision, whereby Plaintiff was further damaged in the sum of, to-wit, TWO HUNDRED AND FIFTY DOLLARS (\$250.00). And Plaintiff avers as a further direct proximate result of the said unlawfully parking on the part of the said Defendants, his honeymoon was disrupted and very much shortened in-

asmuch as he had obtained a furlough from the United States Navy for the specific purpose of getting married and had to return to duty when his furlough was over and said collision occurred during the period of said furlough. And Plaintiff avers that all of such damages were a direct and proximate result of the said unlawfully parking on the part of the said Defendants as aforesaid, hence this suit.

Albert F. Ganton

AND

Sharon Stone

ATTORNEYS FOR PLAINTIFF

Plaintiff demands a trial by Jury.

Albert F. Ganton

AND

Sharon Stone

ATTORNEYS FOR PLAINTIFF

Defendants' Addresses:

Loxley, Alabama.

1986 **RECORDED**

SUMMONS & COMPLAINT

EDWARD MASON, Jr.,

Plaintiff,

vs.

FRED C. GRIFFIN AND JUANITA
GRIFFIN, individually, jointly
and severally,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed: May 9th, 1953.

Alice J. Wicks
Clerk.

Received in Sheriff's Office
this 11 day of May 1953
TAYLOR WILKINS, Sheriff

5-20-53
Executed May 20, 1953
By Serving copy on
Fred. C. Griffin
Juanita Griffin

Sheriff
Taylor Wilkins
By
Edleigh