

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 William E. Parks 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 Lorena C. Minchew.

Witness my hand this 23rd day of September, 1969.

Alice J. Duck
Clerk

LORENA C. MINCHEW,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

X

WILLIAM E. PARKS,

X

AT LAW

Defendant.

X

8894

The Plaintiff claims of the Defendant the sum of Twenty Thousand Dollars (\$20,000.00) as damages for that heretofore on, to-wit, the 20th day of June, 1969, at the intersection of Milwaukee Street and Palmer Street in the City of Robertsdale, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause the Plaintiff's automobile being driven by her at said time and place to leave the road and overturn, and as a proximate result of such negligence of the Defendant, the Plaintiff sustained severe personal injuries, in that she received an injury to her spine and received a severe blow to her

head causing a concussion, she was made sick, sore and lame and endured much pain and suffering and was caused to incur large medical expenses, all of said injuries being the proximate result of the negligence of the Defendant as aforesaid in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John E. Chason

The Plaintiff respectfully demands
a trial of this cause by a jury.

CHASON, STONE & CHASON

By: John E. Chason

Attorneys for Plaintiff

OF COUNSEL:

CHASON, STONE & CHASON
Attorneys at Law
Bay Minette, Alabama

FILED

SEP 23 1969

FOREST A. CHRISTIAN
Attorney at Law
Foley, Alabama

ALICE J. DUCK

CLERK
REGISTER

RECEIVED

SEP 23 1969

WILLIAMS
CLERK

78894 418L
LORENA C. MINCHEW,

Plaintiff,

VS.

WILLIAM E. PARKS,
5215 N. BORDER Dr.
Mobile, Ala. Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

FILED

* * * * *

SEP 23 1969

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

RETURNED

9-26-69

Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff

By J. Thomas, D.S.

SEP 25 9 28 AM '69

MOBILE COUNTY
CLERK

The Plaintiff claims of the defendant the sum of Twenty
Thousand Dollars (\$20,000.00) as damages for that heretofore on,
to-wit, the 20th day of June, 1969, at the intersection of
Milwaukee Street and Palmer Street in the City of Robertsdale,
Baldwin County, Alabama, the defendant so negligently operated a
motor vehicle as to cause the Plaintiff's automobile being driven
by her at said time and place to leave the road and overturn, and
as a proximate result of such negligence of the defendant, the
Plaintiff sustained severe personal injuries, in that she re-
ceived an injury to her spine and received a severe blow to her

LORENA C. MINCHEW,	X	Plaintiff,	
	X	IN THE CIRCUIT COURT OF	
	X		
	X		
BALDWIN COUNTY, ALABAMA	X		
	X		
	X		
AT LAW	X		
7888	X	Defendant.	

Alice S. Clark
Clerk

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appear within thirty days from the service of this writ in the
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same, then and there to answer the Complaint of Lorena C. Minchew.
Witness my hand this 23rd day of September, 1969.

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STATE OF ALABAMA
BALDWIN COUNTY
IN THE CIRCUIT COURT - LAW SIDE

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CHASON, STONE & CHASON

By: John E. Chason

The Plaintiff respectfully demands
a trial of this cause by a jury.

CHASON, STONE & CHASON

By: John E. Chason

Attorneys for Plaintiff

OF COUNSEL:

CHASON, STONE & CHASON
Attorneys at Law
Bay Minette, Alabama

FOREST A. CHRISTIAN
Attorneys at Law
Foley, Alabama

FILED

SEP 23 1969

ALICE J. DUCK

CLERK
REGISTER

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endured much pain and suffering and was caused to incur large

medical expenses, all of said injuries being the proximate result

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mentioned, hence this suit.

CHASON, STONE & CHASON

By: John E. Chason

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a trial of this cause by a jury.

CHASON, STONE & CHASON

By: John E. Chason

OF COUNSEL:

CHASON, STONE & CHASON

Attorneys at Law

Bay Minette, Alabama

FOREST A. CHRISTIAN

Attorney at Law

Foley, Alabama

FILED

SEP 28 1928

REGISTER
CLERK

WILLIE J. DICK

Wm. E. Parks
5245 W. Barlow Ave.
L.A.S. of known
add. County Jail
not in jail
MOVED