STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF IN THE STATE OF ALABAMA -- GREETINGS:

You are hereby commanded to summon WILSON HANCOCK, of Foley, Alabama, to appear before the Circuit Court of Baldwin County, Alabama at the place of holding the same, to plead, answer or demur, within thirty days from service hereof to the Complaint of CHARLES SHUMATE.

Witness my hand, this . . . day of . . . . . , 1969.

. . . . . .

* *

CHARLES SHUMATE,	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN CONNTY, ALABAMA
vs.	)	AT LAW
WILSON HANCOCK,	)	NO. 8898
Defendant	)	

COMPLAINT

COUNT ONE: The Plaintiff claims of the Defendant Three Hundred and Fifty-three Dollars($353.00) as damages for that heretofore on to wit: August 29, 1969, the Plaintiff's authomobile was being driven along and upon Orange Avenue, heading east, a public road in the City of Foley, Alabama, and Wilson Hancock, while under a duty to drive his vehicle in a safe and prudent manner upon the public roadways, did at the intersection of South Alston Street and Orange Avenue negligently drive his automobile into the Plaintiff's automobile; and as a proximate consequence of the Defendant's negligence, the Plaintiff's automobile was greatly bent, mashed, broken and damaged about the rear and left side, and the market value thereof was greatly and permanently depreciated.

Daniel E. Robison
Daniel E. Robison
Attorney for Plaintiff

FILED
SEP 29 1969
ALICE J. DUCK CLERK REGISTER

Ef 10-16-69

No. 8898

Charles Shumate

vs.

Wilson Hancock

FILED

SEP 29 1969

ALICE J. DUCK CLERK REGISTER

Received 29 day of Sept. 1969

and on 16 day of Oct 1969

I served a copy of the within SC

on Wilson Hancock

By service on

TAYLOR WILKINS, Sheriff

By

Sheriff claims 72 miles @

Ten Cents per mile Total $ 7.20

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Daniel Robinson

CHARLES SHUMATE,	)	
Plaintiff	)	IN THE CIRCUIT COURT OF
v.	)	BALDWIN COUNTY, ALABAMA
WILSON HANCOCK,	)	AT LAW No.8898
Defendant	)	

AMENDMENT

Comes now the Plaintiff and asks leave of the Court to amend his complaint, in that he has discovered that the Defendant, WILSON HANCOCK, is a minor, and for the style of the Defendant to be changed to:"WILSON HANCOCK, a minor."

And the Plaintiff respectfully requests that the Court appoint a guardian ad litem to defend this suit for said minor.

Daniel E. Robison
Attorney for Plaintiff

I hereby certify that a copy of this pleading has been served on counsel for Defendant, CHASON, STONE & CHASON, on this 21st day of November, 1969, by mailing the same, U.S. Mail, First Class.

Daniel E. Robison

FILED
NOV 2 1969
ALICE J. DUCK CLERK REGISTRAR

CHARLES SHUMATE,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
WILSON HANCOCK,	X	AT LAW
Defendant.	X	

Comes now the Defendant in the above styled cause, by and through his attorneys of record, and for answer to the Complaint heretofore filed against him in said cause, makes the following separate and several pleas, to-wit:

1. Not guilty.

2. For that the Plaintiff at the time and place complained of was then and there guilty of negligence which proximately contributed to his alleged injuries, hence he should not recover.

CHASON, STONE & CHASON

By: John Earle Chason

FILED

OCT 27 1969

ALICE J. DUCK CLERK REGISTER

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served [illegible] for all parties by the [illegible] mailing [illegible] by first class U.S. Mail, properly addressed and postage prepaid, this 27 day of October, 19 69

John Earle Chason

8898