

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 Donald Vardon Wilson 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 Robert Donald Jenkins, III, a minor, suing by and through Robert Donald Jenkins, Jr., as his father and next friend.

Witness my hand this 3 day of Oct,

1969.

Reece Duck
Clerk

ROBERT DONALD JENKINS, III, a X
minor, suing by and through
Robert Donald Jenkins, Jr., as X
his father and next friend,

Plaintiff,

vs.

DONALD VARDON WILSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant the sum of Seven Thousand Five Hundred Dollars (\$7,500.00) as damages for that heretofore on, to-wit, the 24th day of January, 1969, at a point on U.S. Highway 31 at its intersection with College Drive within the city limits of Bay Minette, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle being driven by the Plaintiff and as a direct and proximate result of such negligence of the Defendant the Plaintiff was personally injured in that he

suffered a "whiplash" injury to the cervical spine and was made sick, sore and lame for a long period of time and has endured much pain and suffering and will continue to experience pain and suffering in the future; he has been caused to incur hospital and medical expenses and he has been partially disabled, the extent and duration of which is unknown at this time to the Plaintiff, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason

Plaintiff respectfully requests trial
of this cause by jury.

John E. Chason

Defendant may be served at
D&D Septic Tank Service
Bay Minette, Alabama

FILED

OCT 3 1969

ALICE J. DUCK CLERK
REGISTER

Received 3 day of Oct 1969
and on 3 day of Oct 1969
I served a copy of the within Sec
on Donald Vardon Wilson

By service on _____

Sheriff claims 4 miles at
Ten Cents per mile Total \$ 40
TAYLOR WILKINS, Sheriff
BY Robert
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff
By D. J. Wilkins
2 miles South of B.V.

MD. 8913

ROBERT DONALD JENKINS, III, a minor
suing by and through Robert Donald
Jenkins, Jr., as his father and
next friend,

Plaintiff,

vs.

DONALD VARDON WILSON,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

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