

TELFAIR J. MASHBURN, JR.

ATTORNEY AT LAW
DAHLBERG BUILDING
PHONE: 4661
BAY MINETTE, ALA.

2046

S U M M O N S.

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. 0

You are hereby commanded to summon EDISON PUGH AND HOWARD STACEY 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 CLAUDE S. WHITE.

Witness my hand this 24th day of July, 1953.

Reice J. Mashburn
C L E R K.

C O M P L A I N T.

CLAUDE S. WHITE,

Plaintiff,

VS.

EDISON PUGH AND

HOWARD STACEY,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

C O U N T O N E.

The Plaintiff claims of the Defendants the sum of TWO HUNDRED FIFTY (\$250.00) DOLLARS AS damages for that, heretofore, on, to-wit: September ^{22,} ~~24,~~ 1952, at about 11:30 P. M., the plaintiff was operating an automobile on a public highway, viz: Alabama Highway No. 3, in Baldwin County, Alabama, at a point about one mile south of Foley, Alabama, where he had a right to be, and the defendant, HOWARD STACEY, an agent, servant or employee of the defendant, EDISON PUGH, while acting within the line and scope of his employment, so negligently operated an automobile then and there, as to cause said automobile he was operating to run over, upon or against the automobile which the plaintiff was then and there operating; and plaintiff avers that as a proximate consequence thereof plaintiff's automobile was demolished or greatly damaged or rendered less valuable; the left front tire and tube were demolished, the left front bumper, fender,

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and door were damaged and demolished, all to the damage of the plaintiff as aforesaid. And plaintiff avers that all of his damages were proximately caused by the said negligence of the defendant, Howard Stacey, and agent, servant, or employee of the defendant, Edison Pugh, while acting within the line and scope of his employment as such agent, servant or employee, in and about the negligent operation of said automobile at the time and place and on the occasion aforesaid; wherefore he sues.

FILED
JUL 14 1933

SUMMONS AND COMPLAINT

Defendant

Telfair J. Mashburn, Jr.
Attorney for Plaintiff.

NO. 10

PL. 141

BY TOLAN COOKLEY, ATTORNEY

IN THE CIRCUIT COURT OF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 2046

CLAUDE S. WHITE,

Plaintiff,

vs.

EDISON PUGH AND

HOWARD STACEY,

Defendant.

SUMMONS AND COMPLAINT.

FILED

JUL 24 1953

ALICE L. DUCK, Clerk

CLERK OF THE COURT
BALDWIN COUNTY, ALABAMA
BY MAIL, JULY 24, 1953

S U M M O N S.

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA:
 COUNTY OF BALDWIN. 0

You are hereby commanded to summon EDISON PUGH AND HOWARD STACEY 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 CLAUDE S. WHITE.

Witness my hand this 24th day of July, 1953.

Reuben L. Henck
 C L E R K.

C O M P L A I N T.

CLAUDE S. WHITE,	0	
	0	
Plaintiff,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
EDISON PUGH AND	0	AT LAW.
	0	
HOWARD STACEY,	0	NO. _____
	0	
Defendants.	0	

C O U N T O N E.

The Plaintiff claims of the Defendants the sum of TWO HUNDRED FIFTY (\$250.00) DOLLARS AS damages for that, heretofore, on, to-wit: September ^{22,}~~24,~~ 1952, at about 11:30 P. M., the plaintiff was operating an automobile on a public highway, viz: Alabama Highway No. 3, in Baldwin County, Alabama, at a point about one mile south of Foley, Alabama, where he had a right to be, and the defendant, HOWARD STACEY, an agent, servant or employee of the defendant, EDISON PUGH, while acting within the line and scope of his employment, so negligently operated an automobile then and there, as to cause said automobile he was operating to run over, upon or against the automobile which the plaintiff was then and there operating; and plaintiff avers that as a proximate consequence thereof plaintiff's automobile was demolished or greatly damaged or rendered less valuable; the left front tire and tube were demolished, the left front bumper, fender,

and door were damaged and demolished, all to the damage of the plaintiff as aforesaid. And plaintiff avers that all of his damages were proximately caused by the said negligence of the defendant, Howard Stacey, and agent, servant, or employee of the defendant, Edison Pugh, while acting within the line and scope of his employment as such agent, servant or employee, in and about the negligent operation of said automobile at the time and place and on the occasion aforesaid; wherefore he sues.

FILED

7-24 1953

ALICE J. DUCK, Clerk

Jeffrey A. MacLennan
Attorney for Plaintiff.

Received in Sheriff's Office
this 24 day of July 1953
TAYLOR WILKINS, Sheriff

RETURNED 7/28/53
Not found in my County after diligent search
and inquiry.
W. H. HOLCOMBE, Sheriff
R. J. Moulton

EXECUTED
This 1st day of Feb 1954
by serving a copy of the within on
Howard Stacey
W. H. HOLCOMBE, Sheriff
Mobile County, Ala.
By: W. E. Howell D.S.

RETURNED 3-26-54
Not found in my County after diligent search
and inquiry. Edison Pugh
W. H. HOLCOMBE, Sheriff
By W. E. Howell D.S.

RECORDED
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 2046

CLAUDE S. WHITE,
Plaintiff,

Vs.

EDISON PUGH AND
HOWARD STACEY.

SUMMONS AND COMPLAINT.

FILED
JUL 24 1953
ALICE J. BUCK, Clerk

TELFAIR J. MASHBURN, JR.

ATTORNEY-AT-LAW

BAY MINETTE, ALABAMA

Edison Pugh
606 Montrose St
Mobile, Ala