

SUMMONS

SUMMONS

STATE OF ALABAMA)
)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Leslie Williams and Mamie Jackson 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 Willie James Williams.

Witness my hand this 18th day of September, 1953.

Wesley J. Smith
Clerk

COMPLAINT

WILLIE JAMES WILLIAMS,
Plaintiff,
vs.
DESLIE WILLIAMS and
MAMIE JACKSON,
Defendants.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that on heretofore, to-wit: March 20, 1953 the Defendant, Mamie Jackson, who was then and there acting by and through the Defendant, Leslie Williams, as her agent, servant or employee, so negligently operated a motor vehicle on the Belforest Road, a public road in Baldwin County, Alabama, at a point about ten (10) miles West of Loxley, Alabama, as to cause or allow the same to run into, upon or against the automobile of the Plaintiff which was then and there being operated on said public road and as a proximate result and consequence of the negligence of the agent, servant or employee of the Defendant, Mamie Jackson, aforesaid, the Plaintiff's automobile was greatly damaged in this, the same was so badly bent, broken and smashed that the same was a total loss to the Plaintiff, all to his damage, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that on to-wit, the 20th day of March, 1953 the Defendant, Leslie Williams, who was then and there a servant or agent of the Defendant, Mamie Jackson, while acting within the line and scope of his agency, so negligently operated a motor vehicle in an Easterly direction on the Belforest Road, a public road in Baldwin County, Alabama, at a point approximately ten (10) miles West of Loxley, Alabama, as to cause or allow said motor vehicle to run into, upon or against the motor vehicle of the Plaintiff which was then and there being operated on said public road in a Westerly direction, and as a proximate result of which negligence the Plaintiff's automobile was totally destroyed wherefore Plaintiff brings this suit and asks judgment in the above amount.

COUNT THREE:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that on to-wit, the 20th day of March, 1953, the said Leslie Williams, who was then and there a servant or agent of the Defendant, Mamie Jackson, while acting within the line and scope of his employment as such, wantonly damaged the automobile of the Plaintiff on the Belforest Road, a public road in Baldwin County, Alabama, at a point approximately ten (10) miles West of Loxley, Alabama, by then and there wantonly driving a motor vehicle into, upon and against the automobile of the Plaintiff and as a proximate result of which wantonness the Plaintiff's automobile was totally destroyed, wherefore Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

By: _____

M. J. Stone
Attorneys for Plaintiff.

Plaintiff demands trial of this cause by jury.

CHASON & STONE

By: Malcolm G. Stone

Defendant, Leslie Williams, resides at Loxley, Alabama.

Defendant, Mamie Jackson, resides at Route One, Daphne, Alabama.

Received in the Clerk's Office
this 18 day of Sept 1953
TAYLOR WILKINS, Sheriff

742089
RECORDED

WILLIE JAMES WILLIAMS,
Plaintiff,

vs.

LESLIE WILLIAMS and
MAMIE JACKSON,

Defendants.

Served on _____
a serving copy of within Summons and
Complaint on

Leslie Williams 9/24/53
Mamie Jackson 10-2-53

Taylor Wilkins Sheriff
By J. F. Hall Deputy Sheriff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

Filed the 18th day of September,
1953.

Reice J. French
Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA