

2120

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - IN LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Calvin Ethridge to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Imogene Knowles.

Witness my hand, this the 28th day of October, 1953

Reese J. Leach
CLERK

IMOGENE KNOWLES
Plaintiff

vs.

CALVIN ETHRIDGE
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. _____.

Plaintiff claims of the defendant, Calvin Ethridge, the sum of ONE THOUSAND DOLLARS (\$1.000) as damages for that heretofore to-wit:

That on the night of October 19, 1953, on U. S. Highway 90 in Baldwin County, Alabama, at a point 7,000 feet east of the east end of the Tensaw River Bridge, the plaintiff was riding in an automobile being operated by another person, and the defendant, Calvin Ethridge, at the same time and at the same place so negligently managed, operated, or controlled a 1948 Ford in such a manner that said automobile was caused to collide with the automobile in which the plaintiff was a passenger, and as a proximate consequence of the said collision and the defendant's negligence, plaintiff received severe and painful injuries to her neck and to her back and required hospital treatment therefore, and incurred great pain and suffering.

James Owens, Jr.
Attorney for the Plaintiff

Plaintiff demands a trial by Jury
pursuant Code 1940, Title 7, Sec. 260.

James Owens, Jr.
FILED

10-28-53

ALICE J. CRICK, Clerk

Received in Sheriff's Office
this 28 day of Oct 1953
TAYLOR WILKINS, Sheriff

CP 734 4/
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 7120

IMOGENE KNOWLES

Plaintiff

vs.

CALVIN ETHRIDGE

Defendant

SUMMONS AND COMPLAINT

FILED

10-28-53

Archie H. Hester
CLERK

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

921 A Madison Ave
Chickasaw, Ala

RETURNED 12/3/53

Not found in my County file
and in my

W. B. Jones