

H. B. DOWLING, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
-vs- : AT LAW
GEORGE B. DUCKWORTH, : NO. 2125
Defendant. :

COUNT ONE

Plaintiff claims of the Defendant the sum of, to-wit, ONE THOUSAND FIVE HUNDRED AND NO/100 (\$1,500.00) DOLLARS, damages, for that heretofore, on, to-wit, the 5th day of June, 1953, the Defendant so negligently operated a motor vehicle in a southwardly direction on Alabama Highway 3, a public highway in Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, on, over, against, or upon an automobile owned by the Plaintiff, which said automobile was then and there being operated southwardly on said Alabama Highway 3, and as a proximate consequence of the Defendant's negligent operation of said motor vehicle at said time and said place, the Plaintiff's automobile was badly bent, broken, smashed, and otherwise damaged, and the Plaintiff lost the use thereof for a long period of time.

FILED

11-3-53

ALICE J. DUCK, Clerk


Attorney for Plaintiff

Defendant's address:

Route 1
Robertsdale, Alabama

Plaintiff respectfully demands trial by jury.


Attorney for Plaintiff

FILED
NOV 2 1953
ALICE L. DUEK, Clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2125

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon George B. Duckworth

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

George B. Duckworth, Defendantby E. B. Dowling

, Plaintiff

Witness my hand this 3rd day of November 1953Reice J. Duck, Clerk

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

H. B. DOWLING

Plaintiffs

vs.

GEORGE B. DUCKWORTH

Defendants

SUMMONS and COMPLAINT

Filed 11-3-53, 19

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Nov. 3, 1953

Taylor Walburn, Sheriff

I have executed this summons

this 11/14, 1953
by leaving a copy with

George B. Duckworth

Taylor Walburn, Sheriff
Edw. Steadman, Deputy Sheriff

H. B. DOWLING

PLAINTIFF

VS

GEORGE B. DUCKWORTH

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. 2125

PLEAS

1.

Not guilty.

2.

The Plaintiff was guilty of negligence which contributed proximately to the injuries complained of in the complaint in that on said day and date the Plaintiff by and through his agent, servant or employee Lord Edward Wheyland who was then and there acting within the line and scope of employment so negligently operated the Plaintiff's automobile in a southerly direction on Alabama Highway No. 3, a public highway in Baldwin County, Alabama, as to cause the said automobile to collide with the automobile of the Defendant George B. Duckworth which negligence proximately contributed to the Plaintiff's alleged damages and injuries.

Albert M. Brantley
Attorney for the Defendant

FILED

11-28-53

ALICE J. DUCK, Clerk

2125-

H. B. DOWLING

PLAINTIFF

VS

GEORGE B. DUCKWORTH

DEFENDANT

PLEAS

FILED
NOV 23 1957
AUG 1. 1957, CHAS

NOV 23 1957