STATE OF ALABAMA, 0
COUNTY OF BALDWIN. 0

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JODIE TALMAGE WALL to appear within thirty days from the service of the 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 H. D. ROBERTS.

Witness my hand this 5th day of November, 1953.

Weice J. Direke

COMPLAINT.

H. D. ROBERTS,

Plaintiff,

Vs.

JODIE TALMAGE WALL,

Defendant.

O

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

NO.

NO.

Defendant.

COUNT ONE.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED (\$300.00) DOLLARS as damages for this, that on, to-wit: the 22nd day of June, 1953, said defendant was operating or driving an automobile on a road or highway, Alabama Highway No. 89, which was used and traveled over by the public and over which the plaintiff and the public had a right to travel, about four miles east of Elberta, Baldwin County, Alabama; that on said date the plaintiff was driving or operating his automobile on said road or highway at said place; that said defendant at said time and place negligently ran the automobile which he was driving or operating along said road or highway into or against Plaintiff's automobile, and as a proximate result thereofplaintiff's said automobile was greatly broken, bent, bruised, indured and damaged, plaintiff was caused thereby to pay out or become liable for large sums of money for parts and repairs for his said automobile, and was deprived of the use of his said automobile for a long period of time, and thereby

caused to lose much money. And plaintiff avers that he received all of the said injuries and damages as a proximate result of defendant's said negligence.

Fulso

11-4 1953

ALKE I THEK, Chick

Attorney for Plaintiff.

this A day of Age, 1933 TAYLOR WILKINS, Sheriff

Rec ved day of 19 1 and on 19 day of 195.3 I served a copy of the within on

By service on Jackes Talange Wall

TAYLOR WILKINS, Sheriff
By Estight Steathers

NO. 2126

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.

H. D. ROBERTS,
Plaintiff,

Vs.

JODIES TALMAGE WALL,
Defendant.

SUMMONS AND COMPLAINT.

FILED
NOV 4 1553

AUCE J. BUCK, Clark

TELFAIR J. MASHBURN, JR.,
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

Def. lives at Elberta, Ala.