PLEAS

LEONARD J. BLAIR	Ŏ
PLAINTIFF	IN THE CIRCUIT COURT OF
VS	BALDWIN COUNTY, ALABAMA,
	Y LAW
ANTON JUSTL	(CASE NO. 2145)
DEFENDANT PRODUCTION OF THE PROPERTY OF THE PR	Annual Control of Cont

Comes now Anton Justl, the Defendant in the above styled cause, and for a plea to the Complaint filed in said cause says:

l.

Not guilty.

2.

The Plaintiff was guilty of negligence which contributed proximately to the injuries complained of in the Complaint, in that on the same day and date the Plaintiff so negligently operated the automobile be was driving in a southerly direction on the Old Loxley-Robertscale Highway at a point about $2\frac{1}{2}$ miles Northeast of Robertsdale at a point of an intersection with a dirt road, both of which are public roads in Baldwin County, Alabama, as to cause or allow said automobile to collide with or run against the automobile of the Defendant, which was then and there being driven in an Easterly direction on said road which negligence proximately contributed to the Plaintiff's alleged damages and injuries.

Attorney for the Defendant

RECORDED

LEONARD J. BLAIR

PLAINTIFF

VS

ANTON JUSTL .

DEFENDANT

Filed 1-19-54 acceptaence

PLEAS

SUMMONS.

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

You are hereby commanded to summon ANTON JUSTL 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 the same, then and thereto answer the Complaint of LEONARD J. BLAIR.

Witness my hand this / day of December, 1953.

Augt rench

COMPLAINT.

LEONARD J. BLAIR,

Plaintiff,

Vs.

ANTON JUSTL,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO.

COUNT ONE.

20000000

The plaintiff claims of the defendant the sum of five hundred (\$500.00) dollars as damages for that heretofore on, to-wit: October 31, 1953, the plaintiff was driving his Chewrolet pick-up truck upon the old Loxley-Robertsdale Highway, a public highway in Baldwin County, Alabama, at a point about two and one-half miles northeast of Roberts-dale, Alabama, where he had a right to be, and then and there the defendant so negligently operated his automobile, which he was then and there driving, that by reason thereof and as the proximate result and consequence thereof, the said two vehicles collided, causing great damages and injuries to the plaintiff's pick-up truck: both body springs were broken and torn loose from the frame, the right front wheel was broken, the windshield was broken, the headlights were broken, the frame was badly bent, the fenders were ruined, and the radiators was ruined, all to the damage of the plaintiff as aforesaid.

And plaintiff avers that all of his damages as aforesaid were

proximately caused by the negligence of the defendant, in that he negligently caused, allowed or permitted his said automobile to run upon, over or against the automobile pick-up truck of the plaintiff; wherefore he sues.

Jeltown R. Whallbeere, H.

Plaintiff respectfully requests that this cause be tried by a jury.

ATTORNEY FOR PLAINTIFF.

Received____day_of__ and on le day of Dec I served a copy of the within____ By service on autan Ins

TAYLOR, WILKINS, Sheriff
By Elevante State Bes

And any County County State 1 10 0-0

TAYLOR WILKINS, Shoriff

LEONARD J. BLAIR,

Plaintiff,

Vs.

ANTON JUSTL,

Defendant,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

AT LAW.

NO.

SUMMONS AND COMPLAINT,

DEC 10 1953

auck J. Buch, Cen

TELFAIR J. MASHBURN, JR. ATTORNEY-AT-LAW

BAY MINETTE, ALABAMA

Def. lives on Dld Loxley-Robertsdale Road -- 22 miles North of Robertsdale.