

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Lavander Wilson and Jeannie Wilson, jointly and severally, 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 there to answer the Complaint of Robert Blackmon.

Witness my hand, this the 30 day of Apr, 1970.

Alice J. Duck  
Clerk,  
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ROBERT BLACKMON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
LAVANDER WILSON and	X	AT LAW
JEANNIE WILSON, jointly	X	CASE NO. <u>9233</u>
and severally,	X	
Defendants.	X	
	1.	

The Plaintiff claims of the Defendants, the sum of FIVE HUNDRED (\$500.00) DOLLARS, as damages, for that heretofore on to-wit, the 13th day of September, 1969, in the City of Bay Minette, Alabama, the Plaintiff's motor vehicle was parked at 518 Elm Street, a place where he had a right to park his motor vehicle, at which time and place the Defendant, Jeannie Wilson, who was a servant, agent or employee of the Defendant, Lavander Wilson, while acting within the line and scope of her employment as such, negligently backed the motor vehicle which she was driving, into the left front portion of the Plaintiff's motor vehicle, and as a direct proximate result of said negligence, the Plaintiff's motor vehicle was damaged on his left front fender and the motor vehicle's wheels were knocked out of line, all to the damage of the Plaintiff.

2.

The Plaintiff claims of the Defendant, Jeannie Wilson, the sum of THREE HUNDRED (\$300.00) DOLLARS for that heretofore, on to-wit, the 13th day of September, 1969, in the City of Bay Minette, Alabama, the Plaintiff's motor vehicle was parked at 518 Elm Street, a place where it had a right to be, at which time and place, the Defendant, Jeannie Wilson, so negligently operated the motor vehicle which she was driving so as to back the same into the front, left fender of the Plaintiff's motor vehicle, and as a proximate result of said negligence, Plaintiff's motor vehicle was damaged on his left front fender and the motor vehicle's wheels were knocked out of line, all to the damage of the Plaintiff.

WILTERS & BRANTLEY

BY:

*Harry Wilters*  
Attorneys for Plaintiff

Defendants address:

Bay Minette, Alabama

FILED

APR 30 1970

ALICE J. DUCK CLERK  
REGISTER

706 Brady rd  
407 Day Ave

Received 30 day of April 1970  
and on 4 day of May 1970  
I served a copy of the within SVCT  
on Lavander & Jeannie Wilson

By service on \_\_\_\_\_

TAYLOR WILKINS Sheriff  
by *T. A. Wilkins*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9233

ROBERT BLACKMON,

Plaintiff,

vs.

LAVANDER WILSON and  
JEANNIE WILSON, jointly  
and severally,

Defendants.

SUMMONS AND COMPLAINT

WILTERS & BRANTLEY  
Attorneys at Law  
Bay Minette, Alabama

APR 30 1970

ALICE J. DICK  
CLERK  
REGIST

8634

FILED

ROBERT BLACKMON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
LAVANDER WILSON and	X	AT LAW
JEANNIE WILSON, jointly	X	NO. 9233
and severally,	X	
Defendants.	X	

MOTION TO QUASH

Come now the Defendants in the above styled cause, separately and severally, by and through their Attorneys of Record, and appear specially and only for the purpose of filing this pleading and move to quash the complaint heretofore filed in the above styled cause and respectfully show unto Your Honor the following separate and several grounds in support thereof:

1. That service upon the Defendants was not duly perfected according to the statutes of the State of Alabama.

CHASON, STONE & CHASON

By: John E. Chason  
Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 18 day

of May, 1970.

John E. Chason

**FILED**

MAY 18 1970

65-26

FILED

MAY 18 1970

ALICE J. DUCK  
CLERK  
REGISTER