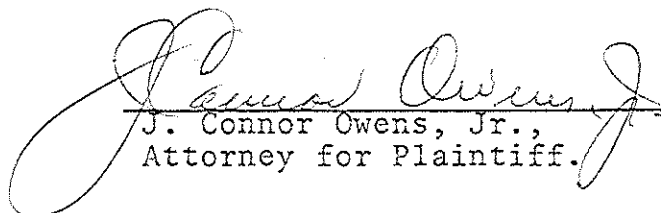


R. E. HOLCOMB,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
EMMA LOU ANDERSON and)	
SALLY THOMPCKINS,)	AT LAW.
)	
Defendants.)	

The Plaintiff claims of the Defendants, the sum of FIVE THOUSAND DOLLARS (\$5,000.00), for that heretofore, on, to-wit, May 31, 1969, at about 11:10 o'clock A. M., on a public road in Baldwin County, Alabama, known as Alabama Highway No. 59, at a point thereon, approximately 195 feet North of the intersection of said highway with Berner Road, the Defendant, Emma Lou Anderson, who was then and there an agent, servant or employee of Sally Thompkins, acting within the line and scope of her employment as such, did so negligently operate an automobile which she was then and there driving, so as to cause or allow said automobile to run into, upon or against the automobile in which the Plaintiff was then and there riding, and as a proximate result and consequence of the negligence of the said Defendant, Emma Lou Anderson, who was then and there an agent, servant or employee of the Defendant, Sally Thompkins, and acting within the line and scope of her employment as such, the Plaintiff's automobile was damaged in this; the front end, left frond and left side was bent and torn; the Plaintiff was caused to incur medical expense; the Plaintiff was bruised and made sore, all to the damage of the Plaintiff aforesaid; hence this suit.


 J. Connor Owens, Jr.,
 Attorney for Plaintiff.

FILED

MAY 12 1970

ALICE J. DUCK CLERK
 REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EMMA LOU ANDERSON and SALLY
THOMPkins

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.....
EMMA LOU ANDERSON and SALLY THOMPkins Defendant..S....

by R. E. HOLCOMB
....., Plaintiff.....

Witness my hand this.....12th.....day of.....May.....19..70

Alvin J. Deech Clerk

Rich
No. 9252

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

R. E. HOLCOMB

Plaintiffs

10th
EMMA LOU ANDERSON and SALLY THOMPSON,

Defendants

SUMMONS AND COMPLAINT

Filed May 12 19 70

Direct Dick
Clerk

2052-B Bragg

BY

J. CONNOR OWENS, JR.

Plaintiff's Attorney

Defendant's Attorney

REC'D SHERIFF DEPT
MOBILE COUNTY ALA
MAY 15 1 23 PM '70

Wor

Defendant lives at
ROBERTSDALE, ALABAMA

Received In Office

May 12 19 *70*
Taylor Wilkins Sheriff
I have executed this summons

this *13-May* 19 *70*
by leaving a copy with

Emma Lou Anderson

EXECUTED

This *10* day of *June* 19 *70*
by serving a copy of the within on
Sally Thompson
RAY D. LINDGREN, Clerk
By *M. Richardson* D.S.

Taylor Wilkins Sheriff
H. B. Brown Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

*50 miles R.T.
R-dale.*

Dear Mrs. Duck:

I have my copy. Thanks.

C. G. Chason