

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Charlie Wade Reynolds 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 same, then and there to answer the Complaint of Charles R. Killian.

Witness my hand this 19 day of May, 1970.

Allice J. Quirk
Clerk

CHARLES R. KILLIAN,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
CHARLIE WADE REYNOLDS,	X	AT LAW
Defendant.	X	NO. <u>9261</u>

The Plaintiff claims of the Defendant the sum of Eight Hundred Dollars (\$800.00) as damages for that heretofore on, to-wit, the eighteenth day of August, 1969, at a point on Alabama Highway Number 59, 2/10ths of a mile North of Blackwell's Service Station near Foley in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate and direct consequence of such negligence of the Defendant the Plaintiff's motor vehicle was bent, damaged or broken in that its rear bumper and fenders were bent, damaged or broken, the deck lid was bent, damaged or broken, the tail lights and reflectors were bent, damaged or broken, the frame was knocked out of alignment and it was necessary that the

car be refinished. The Plaintiff further sustained medical bills and expenses on behalf of his wife, who was a passenger in his vehicle and who was injured in the accident, all as a direct and proximate result of the negligence of the Defendant in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

The Defendant is a minor and the Plaintiff respectfully requests that the Court appoint a guardian ad litem to defend this suit for him. The Defendant may be served at Route 1, Box 69, Foley, Alabama.

CHASON, STONE & CHASON

By: John Earle Chason

FILED

MAY 19 1970

ALICE J. DUCK CLERK
REGISTER

Charles Killian

In South Fla.

Hasnt lived at
this address in some
time.

11-29-00
N

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Alice D. Duck
Clerk

CHARLES R. KILLIAN,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
CHARLIE WADE REYNOLDS,	X	AT LAW
Defendant.	X	NO. <u>9261</u>

The Plaintiff claims of the Defendant the sum of Eight Hundred Dollars (\$800.00) as damages for that heretofore on, to-wit, the eighteenth day of August, 1969, at a point on Alabama Highway Number 59, 2/10ths of a mile North of Blackwell's Service Station near Foley in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate and direct consequence of such negligence of the Defendant the Plaintiff's motor vehicle was bent, damaged or broken in that its rear bumper and fenders were bent, damaged or broken, the deck lid was bent, damaged or broken, the tail lights and reflectors were bent, damaged or broken, the frame was knocked out of alignment and it was necessary that the

car be refinished. The Plaintiff further sustained medical bills and expenses on behalf of his wife, who was a passenger in his vehicle and who was injured in the accident, all as a direct and proximate result of the negligence of the Defendant in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By:

John E. Chason
Attorneys for Plaintiff

The Defendant is a minor and the Plaintiff respectfully requests that the Court appoint a guardian ad litem to defend this suit for him. The Defendant may be served at Route 1, Box 69, Foley, Alabama.

CHASON, STONE & CHASON

By:

John E. Chason

FILED

MAY 19 1970

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Witness my hand this 19 day of May, 1970.

Alice D. Black
Clerk

CHARLES R. KILLIAN,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
CHARLIE WADE REYNOLDS,	X	
Defendant.	X	AT LAW NO. <u>9261</u>

The Plaintiff claims of the Defendant the sum of Eight Hundred Dollars (\$800.00) as damages for that heretofore on, to-wit, the eighteenth day of August, 1969, at a point on Alabama Highway Number 59, 2/10ths of a mile North of Blackwell's Service Station near Foley in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate and direct consequence of such negligence of the Defendant the Plaintiff's motor vehicle was bent, damaged or broken in that its rear bumper and fenders were bent, damaged or broken, the deck lid was bent, damaged or broken, the tail lights and reflectors were bent, damaged or broken, the frame was knocked out of alignment and it was necessary that the

car be refinished. The Plaintiff further sustained medical bills and expenses on behalf of his wife, who was a passenger in his vehicle and who was injured in the accident, all as a direct and proximate result of the negligence of the Defendant in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

The Defendant is a minor and the Plaintiff respectfully requests that the Court appoint a guardian ad litem to defend this suit for him. The Defendant may be served at Route 1, Box 69, Foley, Alabama.

CHASON, STONE & CHASON

By: John E. Chason

FILED

MAY 19 1970

ALICE J. DUCK CLERK
REGISTER

Sheriff claims _____ miles at

Ten Cents per mile Total \$ _____

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

BY _____

Returned 22 day of June 19 20
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

Deputy Sheriff

TAYLOR WILKINS, Sheriff

By service on _____

Received 19 day of May 19 20
and on _____ day of _____
I served a copy of the within St C
on Charlie Wade Reynolds
Plt 1 Box 69 Foley, Ala.

CHARLES R. KILLIAN,

Plaintiff,

vs.

CHARLIE WADE REYNOLDS, Foley, Ala.
Plt 1 Box 69
Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. _____

* * * * *

SUMMONS AND COMPLAINT

* * * * *
Received 19 day of May 19 20
and on _____ day of _____

I served a copy of the within St C

on Charlie Wade Reynolds

By service on _____

CHASON TAYLOR WILKINS & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA

D. C.

Returned 30 day of May 19 20
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

Deputy Sheriff

Not found
9261 R+1
NF