

TERRY JOE LOCKMAN,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
SAMUEL RICHARDSON,)
Defendant.) CASE NO. 9303

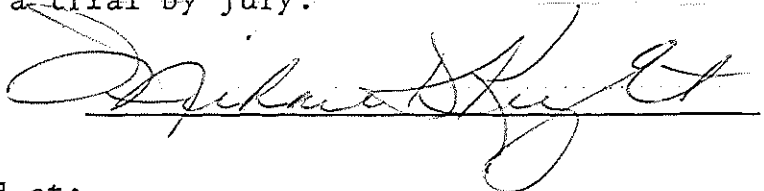
COMPLAINT

Plaintiff claims of the defendant the sum of ONE THOUSAND FIVE HUNDRED AND NO/100 DOLLARS (\$1,500.00), as damages, for that heretofore and on, to-wit, January 3, 1970, the plaintiff was operating his motor vehicle on or upon U.S. Highway 90 at a point where said U.S. Highway 90 intersects County Road 66, both of said roads being public roads in Baldwin County, Alabama, and, at the time and place aforesaid, defendant so negligently operated his motor vehicle so as to cause or allow the same to collide with the plaintiff's motor vehicle, and as a proximate result of the defendant's negligence as aforesaid, the plaintiff was injured and damaged in that several items of personal property belonging to the plaintiff were broken and damaged and plaintiff's motor vehicle was broken, bent, smashed and damaged; hence, this suit.


MICHAEL D. KNIGHT



Plaintiff demands a trial by jury.



Defendant may be served at:

Samuel Richardson
Loxley, Alabama

FILED

JUN 1 1970

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9303

TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon SAMUEL RICHARDSON

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.....

Samuel Richardson

Defendant.....

by Terry Joe Lockman

Plaintiff.....

Witness my hand this 2nd day of June 19 70

Alice J. Lockman Clerk

24 6-5-70

VOL

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THE STATE OF ALABAMA**BALDWIN COUNTY****CIRCUIT COURT****TERRY JOE LOCKMAN**

Plaintiffs

vs.

SAMUEL RICHARDSON

Defendants

SUMMONS AND COMPLAINT

Filed June 2, 19. 70

Alice J. Duck

Clerk

Hand, Arandall, Bedsole, Greaves & Johnston

By: Michael D. Knight
& Chason, Stone & Chason

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Spuller

Received In Office

June 3

19. 70

Taylor Wilkins

Sheriff

I have executed this summons

this

5-June

19. 70

by leaving a copy with

*Samuel Richardson*Sheriff claims *44* miles atTen Cents per mile Total \$ *4.40*

TAYLOR WILKINS, Sheriff

BY

Brown
DEPUTY SHERIFF*Taylor Wilkins*

Sheriff

H. L. Brown

Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

*44 miles R. to
West of Taylor*

TERRY JOE LOCKMAN

Plaintiff,

VS.

SAMUEL RICHARDSON,

Defendant.

IN THE

CITCUIT COURT OF BALDWIN COUNTY,
ALABAMA. AT LAW. NO. 9303

September 10, 1970

TERRY JOE LOCKMAN, THE PLAINTIFF, BEING FIRST DULY SWORN, TESTIFIED:

Examination by Mr. Knight.

Q. Your name is Terry Joe Lockman.

A. Yes sir.

Q. You were the owner of an automobile involved in an accident with
Samuel Richardson on January 3, 1970?

A. Yes sir.

Q. Do you have an opinion as to the fair and reasonable market
value of your automobile immediately prior to the accident?

A. Approximately \$2,500.00.

Q. Do you have an opinion as to the fair and reasonable market
value of that automobile immediately after the accident in its
wrecked condition?

A. Approximately \$1,000.00.

Q. Have you had the automobile repaired?

A. Yes sir.

Q. What was the cost of having it repaired?

A. \$1154.20.

STATE OF ALABAMA
COUNTY OF BALDWIN

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA

PLAINTIFF'S FORTHCOMING BOND

KNOW ALL MEN BY THESE PRESENTS; THAT WE, BALDWIN NATIONAL BANK OF ROBERTSDALE, A CORPORATION, AS PRINCIPALS AND AS SURETIES ARE HELD AND FIRMLY BOND UNTO R. L. GUNNISON IN THE SUM OF FOUR THOUSAND ONE HUNDRED NINETY AND NO/100 DOLLARS, (\$4,190.00), FOR THE PAYMENT OF WHICH WELL AND TRULY TO BE MADE, WE BIND OURSELVES AND EACH OF US, OUR, AND EACH OF OUR HEIRS, EXECUTORS AND ADMINISTRATORS, JOINTLY, SEVERALLY AND FIRMLY BY THESE PRESENTS.

SEALED WITH OUR SEALS, AND DATED THIS 25th DAY OF MAY, 1970.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, THAT WHEREAS, THE SAID BALDWIN NATIONAL BANK OF ROBERTSDALE DID, ON THE 20TH DAY OF MAY, 1970, SUE OUT OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA A WRIT IN DETINUE, DIRECTED TO ANY SHERIFF OF THE STATE OF ALABAMA, AND COMMANDING HIM TO TAKE IN HIS POSSESSION THE FOLLOWING PROPERTY SUE FOR IN SAID ACTION OF DETINUE, TO-WIT:

ONE 1961 TWO-TON INTERNATIONAL TRUCK, SERIAL No. FB-7027E
ONE 1956 INTERNATIONAL HARVESTER TRACTOR SERIAL No. 269914
ONE CULTIVATOR, ONE DOUBLE DISK 6 FOOT PLOW, AND ONE 16 INCH DOUBLE PLOW.

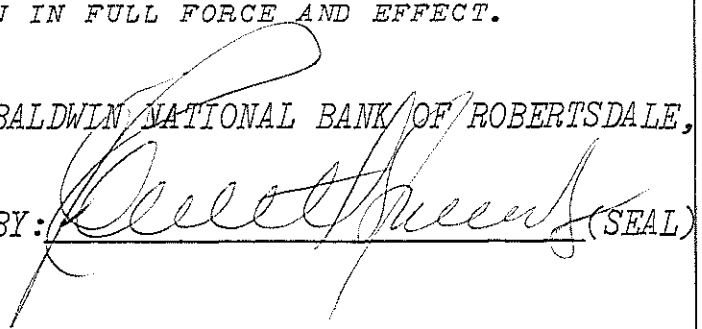
WHICH SAID WRIT WAS PLACED IN THE HANDS OF TAYLOR WILKINS, SHERIFF OF THE COUNTY OF BALDWIN ON THE 2 DAY OF ^{JUNE}~~MAY~~, 1970, AND EXECUTED BY HIM ON THE 5 DAY OF ^{JUNE}~~MAY~~, 1970, BY TAKING INTO HIS POSSESSION THE FOLLOWING PROPERTY, TO-WIT

ONE 1961 TWO-TON INTERNATIONAL TRUCK, SERIAL No. FB-7027E
ONE 1956 INTERNATIONAL HARVESTER TRACTOR SERIAL No. 269914
ONE CULTIVATOR, ONE DOUBLE DISK 6 FOOT PLOW, AND ONE 16 INCH DOUBLE PLOW.


AND, WHEREAS THE SAID R. L. GUNNISON, DEFENDANT IN SAID SUIT HAS FAILED AND NEGLECTED, FOR THE SPACE OF FIVE DAYS FROM THE TAKING INTO POSSESSION OF SAID PROPERTY BY SAID SHERIFF AFORESAID, TO GIVE BOND AND TAKE POSSESSION OF SAID PROPERTY AS AUTHORIZED BY LAW.

Now, THEREFORE, IF THE SAID BALDWIN NATIONAL BANK OF ROBERTS-
DALE, PLAINTIFF IN SAID SUIT, SHALL DELIVER THE ABOVE DESCRIBED
PROPERTY TO THE SAID R. L. GUNNISON, DEFENDANT IN SAID SUIT, WITHIN
THIRTY DAYS AFTER JUDGMENT, IN CASE PLAINTIFF SHALL FAIL TO RECOVER
THE SAME IN ITS SAID SUIT, AND PAY ALL DAMAGES FOR THE DETENTION OF
PROPERTY AND COSTS OF SUIT, THEN, IN THAT EVENT, THIS OBLIGATION
TO BE VOID, OTHERWISE TO REMAIN IN FULL FORCE AND EFFECT.

BALDWIN NATIONAL BANK OF ROBERTSDALE,

BY:  (SEAL)

APPROVED THIS 12 DAY OF June, 1970.


SHERIFF, BALDWIN COUNTY, ALABAMA