

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 Jack McCormick and Foley Tractor Co., Inc., a corporation, 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 Paula M. Meeks.

Witness my hand this 17 day of June, 1970.

Ollie J. Meeks
Clerk

PAULA M. MEEKS,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

X

JACK McCORMICK and
FOLEY TRACTOR CO.,
INC., A Corporation,

X

AT LAW

X

Defendants.

X

9335

The Plaintiff claims of the Defendant the sum of Six Hundred Dollars (\$600.00) as damages for that, heretofore on, to-wit: the 1st day of April, 1970, at the intersection of North McKenzie and Fig Streets in the City of Foley, Baldwin County, Alabama, the Defendant, Jack McCormick, who was then and there the agent, servant or employee of the Defendant, Foley Tractor Co., Inc., a corporation, and acting within the line and scope of his authority as such agent, servant or employee at said time and place did so negligently operate 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 direct and proximate result of such negligence, the vehicle of the Plaintiff sustained damages to the rear fenders, bumper, trunk and trunk lid and the Plaintiff was further caused to incur medical bills and expenses in and about the treatment of her personal injuries, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

Defendant, Jack McCormick,
may be served at Box 25,
Summerdale, Alabama

Defendant, Foley Tractor
Co., Inc., may be served
at Foley, Alabama.

FILED

JUN 17 1970

ALICE J. DUCK CLERK
REGISTER

Sheriff claims 17th
Ten Cents per mile Total \$14.20
TAYLOR WILKINS, Sheriff
Deputy Sheriff

Received 17 day of June 1920
and on 19 day of June 1920
I served a copy of this within
on Jack & M. McCormick & Foley
Tractor Co.
By service on Harry Rea Post.

TAYLOR WILKINS, Sheriff
By *Robert Chason*

9335

PAULA M. MEEKS,

Plaintiff,

vs.

JACK McCORMICK and FOLEY
TRACTOR CO., INC., A
Corporation,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

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CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

PAULA M. MEEKS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
JACK McCORMICK and)	
FOLEY TRACTOR CO.,)	
INC., a corporation,)	
Defendants.)	CASE NO. 9335

P L E A S

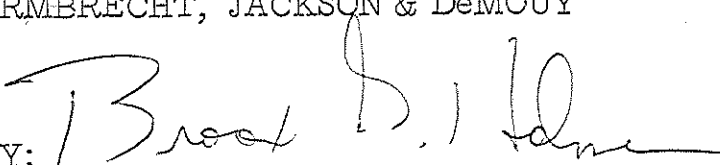
Comes now the Defendant Foley Tractor Company, and for answer to the Complaint and to each and every count thereof, separately and severally, files the following separate and several pleas:

1. Not guilty.

2. This Defendant specifically denies that Defendant Jack McCormick was then and there an agent, servant or employee of Foley Tractor Company, acting within the line and scope of his authority as such agent, servant or employee.

ARMBRECHT, JACKSON & DeMOUY

BY:


BROOX G. HOLMES

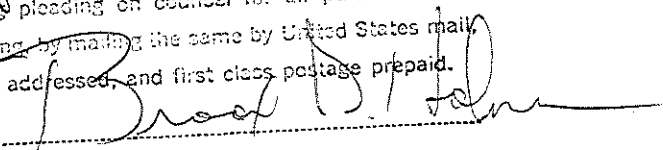
FILED

JUL 10 1970

ALICE J. DUCK CLERK
REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 9 day of June, 1970, served a copy of the foregoing pleading on counsel for all parties to this proceeding, by mailing the same by United States mail, properly addressed, and first class postage prepaid.



PAULA M. MEEKS,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

X

JACK McCORMICK and
FOLEY TRACTOR COMPANY,
INC., A Corporation,

X

AT LAW

NO. 9335

X

Defendants.

X

MOTION

Comes now the Plaintiff in the above styled cause and moves the Court to strike the Defendant, Foley Tractor Company, Inc., as a party Defendant to said cause of action and that said Defendant be dismissed without costs.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

FILED

JUL 29 1970

ALICE J. DUCK

CLERK
REGISTER