

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 Hugh Wallace 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 Simon G. Donald.

Witness my hand this _____ day of _____, 1970.

Clerk

SIMON G. DONALD,

Plaintiff,

vs.

HUGH WALLACE,

Defendant.

X

IN THE CIRCUIT COURT OF

X

X

BALDWIN COUNTY, ALABAMA

X

AT LAW

X

COMPLAINT

The Plaintiff claims of the Defendant the sum of \$700.00 as damages for that heretofore on, to-wit, the First day of April, 1970, at a point on U. S. Highway 31, four-tenths (4/10) of a mile south of Mile Post 11 near Stapleton in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the Plaintiff's vehicle to collide with another motor vehicle and as a proximate result of the negligence of the Defendant the Plaintiff's vehicle was severely damaged in that the entire body of the automobile was bent, damaged or broken; and it was badly depreciated in value all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

FILED

OCT 19 1970

CHASON, STONE & CHASON

By: *John Earl Chason*

ALICE J. DUCK

CLERK
REGISTER

Returned 28 day of OCT 1970
Not found in my county after diligent search and in-
quiry.

By Taylor Wilkins, Sheriff
W. A. Talbert
Deputy Sheriff

TAYLOR WILKINS, Sheriff
By _____

Sheriff claims _____ miles at
Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff

Received 19 day of Oct 1970
and on _____ day of _____
I served a copy of the within 840
on Hugh Wallace
By service on _____

9516

SIMON G. DONALD,
Plaintiff,
vs.
HUGH WALLACE,
Stapleton, Ala
Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED

OCT 19 1970

ALICE J. DUCK CLERK
REGISTER

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

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

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Witness my hand this 19 day of Oct., 1970.

Alice J. Duck
Clerk

SIMON G. DONALD, X
Plaintiff, X
vs. X
HUGH WALLACE, X
Defendant. X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
9516

COMPLAINT

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FILED

OCT 19 1970

ALICE J. DUCK CLERK
REGISTER

CHASON, STONE & CHASON

By: John Earle Chason