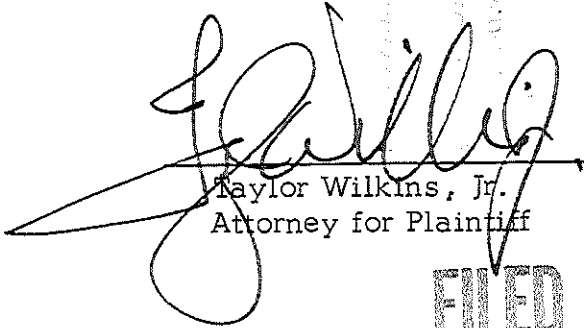


FELTON J. ROBERTS, SR. : IN THE CIRCUIT COURT OF
PLAINTIFF : BALDWIN COUNTY, ALABAMA
VS : AT LAW
SAM BROWN :
DEFENDANT : CASE NO. 9551

The Plaintiff claims of the Defendant the sum of TWO HUNDRED SIXTY AND NO/100 (\$260.00) DOLLARS as damages for that, heretofore on, to-wit, July 13, 1970, the Plaintiff, Felton J. Roberts, Sr. was operating his automobile on a public street, Hand Avenue at or near the intersection of Hand Avenue and Fifth Street, public streets, within the city limits of Bay Minette, Alabama, and Defendant, Sam Brown, so negligently operated a motor vehicle on said Hand Avenue at the place aforesaid, in said county and said state, that the said automobile then and there collided with the automobile which the said Felton J. Roberts, Sr. was then and there operating on said Hand Avenue, and as a proximate result of the negligence of the Defendant as aforesaid, Plaintiff's automobile was severely damaged and bent in the rear portion and the Plaintiff suffered injuries to his neck and back resulting in loss of time from his work along with medical and hospital costs, all to his damage in the sum as aforesaid, hence this suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

NOV 11 1970

ALICE J. DUCK CLERK
REGISTER

FELTON J. ROBERTS, SR.

PLAINTIFF

VS

SAM BROWN

DEFENDANT

Defendant may be served at:

Standard Furniture Company
Bay Minette, Alabama

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 **SAM BROWN**

.....
.....
.....
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.....

..... **SAM BROWN** Defendant.....

by

..... **FELTON J. ROBERTS, SR.**, Plaintiff.....

Witness my hand this..... *11* day of..... *Nov* 19*20*

..... *Alice J. Luck*, Clerk

No. 9551

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

FELTON J. ROBERTS, SR.

Plaintiffs

vs.

SAM BROWN

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

NOV 11 1970 Clerk

ALICE J. DUCK

CLERK
REGISTER

Taylor Wilkins, Jr.

Plaintiff's Attorney

Defendant's Attorney

VOL

68

PAGE 313

Defendant lives at
may be served at:

Standard Furniture Company
Bay Minette, Alabama

Recieved In Office

Nov 11 1970

Taylor Wilkins Sheriff

I have executed this summons

this Nov 12 1970

by leaving a copy with

T
Sam Brown

Taylor Wilkins Sheriff

W A Tolbert Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

November 17, 1970

Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama 36507

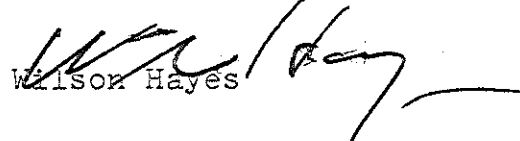
Re: Felton J. Roberts, Sr.
Vs. Sam Brown, Case #9551

Dear Mrs. Duck:

Enclosed is a pleading in the above styled cause.

With kind regards, I am

Yours very truly,

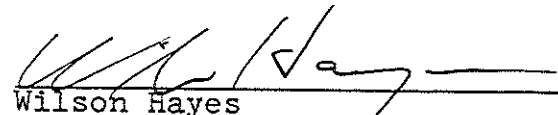

Wilson Hayes

WH/ms
Enc.

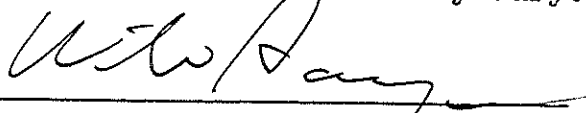
FELTON J. ROBERTS, SR., § IN THE CIRCUIT COURT
Plaintiff, § BALDWIN COUNTY, ALABAMA
Vs. § AT LAW
SAM BROWN, §
Defendant. § NUMBER: 9551

Comes now Defendant in the above styled cause and for
answer to the Complaint says:

1. Not guilty.



Wilson Hayes
Attorney for Defendant

Defendant demands trial by Jury.



CERTIFICATE OF SERVICE

I do hereby certify that I have on this 17th day of Nov,
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, with first class postage prepaid.



FILED

NOV 18 1970

ALICE J. DUCK CLERK
REGISTER

9551

Shaw