

FANNIE R. EPHRIM,
Plaintiff,
Vs.

ROBERT GERALD YORTON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NUMBER: 9706

I

Plaintiff claims of the Defendant the sum of FIVE THOUSAND DOLLARS (\$5,000) for that on to-wit the 23rd day of September, 1970 Defendant so negligently operated an automobile on US Highway 98 in or close to the town of Daphne, Baldwin County, Alabama by stopping such automobile without signal or proper indication as required by law, that as to place the said vehicle which Defendant was then and there operating in the path of Plaintiff's automobile and that as a proximate consequence of such negligence, Plaintiff's automobile which was then and there being operated by Plaintiff was caused or allowed to run into, over or against Defendant's automobile and as a proximate consequence of such negligence of Defendant, Plaintiff's automobile was bent, broken and damaged in and about the body, fenders, frame and engine, hence this suit.

W. H. Day
Attorney for Plaintiff

Plaintiff demands trial by Jury.

W. H. Day

FILED

FEB 22 1971

EUNICE B. BLACKMON CIRCUIT CLERK

Number: _____

Fannie R. Ephrim,
Plaintiff,
Vs.

Robert Gerald Yorton,
Defendant.

In the Circuit Court of
Baldwin County, Alabama
At Law

Defendant may be served:

Highway 98
Daphne, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

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 Robert Gerald Yorton, Highway 98,
Daphne, Alabama

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.....

Robert Gerald Yorton

....., Defendant.....

by Fannie R. Ephrim

....., Plaintiff.....

Witness my hand this 22nd day of Feb 1971

Eunice B. Blackman Clerk

No. 9706

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Lannie B. Ephraim

Plaintiffs

vs.

Robert Gerald Horton

Defendants

SUMMONS AND COMPLAINT

Filed 2-22 1971

Ernie B. Blackburn Clerk

W. Hayes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Feb 22 1971

Taylor Wilkins, Sheriff

I have executed this summons

this 23 Feb 1971

by leaving a copy with

CR

Robert Gerald Horton

Sheriff claims 34 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

W. Crook
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. Crook Deputy Sheriff

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

February 17, 1971

Mrs. Eunice Blackmon, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama 36507

9706

Dear Eunice:

Please file the enclosed damage suit for Fannie
R. Ephrim against Robert Gerald Yorton and have it
served on Defendant.

With kind regards, I am

Yours very truly,

W. H. Hayes
Wilson Hayes

new copy of sum

WH/ms
Enc.