

JAMES W. PARKER, JR., : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY,
vs : ALABAMA
WILLARD T. LOWREY, : AT LAW
Defendant. : CASE NO. 9250

C O U N T O N E

Plaintiff claims of the defendant, the sum of Fifteen Hundred and no/100 (\$1500.00) Dollars, as damages for that heretofore and on, to-wit, May 6, 1970, the defendant so negligently operated an automobile on Satsuma Street at or near its intersection with Pine Street, both being public roads in the City of Foley, County of Baldwin, State of Alabama as to run into, upon and against the motor vehicle of the plaintiff, at said time and place; and as a proximate result of the negligence of the defendant as aforesaid, the plaintiff's said motor vehicle was bent, broken, smashed and rendered less valuable, his front bumper, front grill and hood were smashed, his right front headlight was smashed, his automobile was knocked out of line, for all of which the plaintiff brings this suit.

LYONS, PIPES AND COOK
Attorneys for Plaintiff


COOPER C. THURBER

Defendant may be served at:

P. O. Box 584
Foley, Alabama

FILED

MAR 16 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9750.....

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLARD T. LOWREY.....

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

WILLARD T. LOWREY....., Defendant.....

by JAMES W. PARKER, JR.

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

Witness my hand this 16th day of March 1971..

Ernie D. Blackmon Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

JAMES W. PARKER, JR.

Plaintiffs

vs.

WILLARD T. LOWREY

Defendants

SUMMONS AND COMPLAINT

Filed March 16, 1971.

Eunice B. Blackmon, Clerk

Lyons, Pipes & Cook

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Recieved In Office

Mar. 16 1971

Saylor Wilkins Sheriff

I have executed this summons

this 3-20 1971

by leaving a copy with

cl

Willard T. Lowrey

Sheriff's Office

Ten Cents per mille Total \$2.20

TAYLOR WILKINS, Sheriff

BY Deputy Sheriff

Saylor Wilkins Sheriff

Deputy Sheriff

JAMES W. PARKER, JR.,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

WILLARD T. LOWREY,

X

AT LAW CASE NO. 9750

Defendant.

X

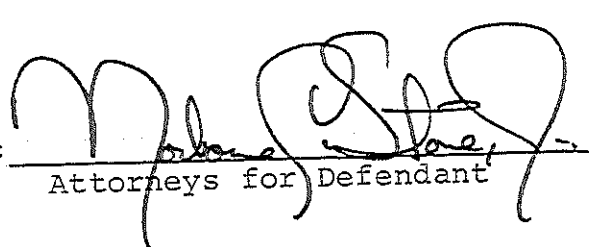
PLEA

Comes now the Defendant in the above styled cause, by his attorneys, and for answer to the Complaint heretofore filed against him, says as follows:

1. Not guilty.

CHASON, STONE & CHASON

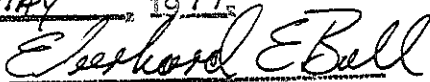
BY:


Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 21 day

of MAY, 1971.


E. B. Blackmon

FILED

MAY 21 1971

EUNICE B. BLACKMON CIRCUIT CLERK