

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 Reese Carter 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 Johnny P. Taylor.

WITNESS my hand this 25 day of March, 1971.

Ernie D. Blackburn  
Clerk

JOHNNY P. TAYLOR,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

BALDWIN COUNTY, ALABAMA

X

REESE CARTER,

X

AT LAW

Defendant.

X

9764

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) as damages for that on, to-wit: August 22, 1970, the Defendant negligently drove an automobile on State Highway 104 at it's intersection with the Greeno Road near Fairhope in Baldwin County, Alabama, into or against an automobile owned by the Plaintiff and as a proximate result of the negligence of such Defendant, the Plaintiff's automobile was damaged in this: the rear bumper, both rear fenders, the top, the rear lights, frame, fuel tank and other parts of the automobile was severely damaged, bent or broken, all to the

damage to the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) as damages for that on, to-wit:

August 22, 1970, the Defendant wilfully damaged the Plaintiff by wilfully driving an automobile into the rear end of the Plaintiff's automobile at a point near Fairhope in Baldwin County, Alabama, where State Highway 104 intersects the Greeno Road and as a proximate result of the wilfull negligence of the Defendant, the automobile of the Plaintiff was damaged in this: the rear bumper, both rear fenders, the top, the rear lights, frame, fuel tank and other parts of the automobile was severely damaged, bent or broken, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

*Sharon Stone & Sharon*  
Attorneys for Plaintiff

Defendant's Address:

c/o Doss F. Carrigan  
33 Jan Drive  
Fairhope, Alabama

**FILED**

MAR 25 1971

EUNICE B. BLACKMON CIRCUIT CLERK

EUNICE B. BLACKMON, CLERK  
CIRCUIT

MAR 32 1931

FILED

Wainhope, Alabama  
33 1st Drive  
c/o Does E. Garrison  
Defendant's address:

Attorneys for Plaintiff  
*James Carter & Baldwin*

above mentioned, hence this suit. \* \* \*  
pent or broken, also the damage to the plaintiff in the sum \* \* \*  
their tank and other parts of the automobile was severely damaged, \* \* \*  
number, both rear fenders, the top, the rear fenders, frame, \* \* \*  
the automobiles of the plaintiff was damaged in this; the rear \* \* \*  
brokenside result of the collision was damage of the defendant, \* \* \*  
where state highway 104 intersects the Gretno Road and as a \* \* \*  
automobile as a being near Wainhope in Baldwin County, Alabama, \* \* \*  
willfully driving an automobile into the rear end of the plaintiff's \* \* \*  
valued \$5, 1930, the defendant willfully damaged the plaintiff by \* \* \*  
thousand dollars (\$5,000.00) as damages for that on, to-wit:

JOHNNY P. TAYLOR,  
Plaintiff,  
vs  
REESE CARTER,  
Defendant.  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
SUMMONS AND COMPLAINT

The Plaintiff claims of the Defendant the sum of TWO  
COUNT TWO

suit.  
damage to the Plaintiff in the sum above mentioned, hence this

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Reese Carter 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 Johnny P. Taylor.

WITNESS my hand this 25 day of March, 1971.

*Ernie B. Blackburn*  
Clerk

JOHNNY P. TAYLOR,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
REESE CARTER,	X	AT LAW
Defendant.	X	9764

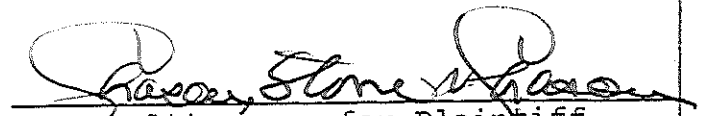
COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) as damages for that on, to-wit: August 22, 1970, the Defendant negligently drove an automobile on State Highway 104 at it's intersection with the Greeno Road near Fairhope in Baldwin County, Alabama, into or against an automobile owned by the Plaintiff and as a proximate result of the negligence of such Defendant, the Plaintiff's automobile was damaged in this: the rear bumper, both rear fenders, the top, the rear lights, frame, fuel tank and other parts of the automobile was severely damaged, bent or broken, all to the

damage to the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) as damages for that on, to-wit: August 22, 1970, the Defendant wilfully damaged the Plaintiff by wilfully driving an automobile into the rear end of the Plaintiff's automobile at a point near Fairhope in Baldwin County, Alabama, where State Highway 104 intersects the Greeno Road and as a proximate result of the wilfull negligence of the Defendant, the automobile of the Plaintiff was damaged in this: the rear bumper, both rear fenders, the top, the rear lights, frame, fuel tank and other parts of the automobile was severely damaged, bent or broken, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

  
Attorneys for Plaintiff

Defendant's Address:

c/o Doss F. Carrigan  
33 Jan Drive  
Fairhope, Alabama

**FILED**

MAR 25 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

9764  
 1971  
 Sheriff  
 Plaintiff  
 Defendant  
 REESE CARTER  
 33 JAS DE 106  
 FHOPE, Fla Defendant.

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 AT LAW

SUMMONS AND COMPLAINT  
 FILED  
 MAR 25 1971  
 EUNICE B. BLACKMON  
 CIRCUIT CLERK  
 CHASON, STONE & CHASON  
 ATTORNEYS AT LAW  
 P. O. BOX 120  
 BAY MINETTE, ALABAMA

Received 25 day of Mar 1971  
 and on day of 1971  
 I served a copy of the within SEC  
 on Reese Carter  
 By service on  
 TAYLOR WILKINS, Sheriff  
 By D. S.

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

THIS MAN IS IN PAKISTAN AND WILL  
 NOT BE BACK FOR 4-5 MONTHS. HE IS  
 A SEAMAN.  
 W. Crook  
 3-26-71