

WILLIAM REMILLONG,
Plaintiff,
VS.
HUBERT LEE RACKARD,
Defendant.

)
) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
) AT LAW
) CASE NO. 9776
)

PLEAS

1.

Not guilty.

2.

The Defendant says that, on to-wit: December 2, 1970, the Plaintiff, William Remillong, so negligently operated his motor vehicle on U. S. Highway #90, a public road in Baldwin County, Alabama, at a point that is approximately 1 1/2 miles West of mileage post #41, as to contribute to the injuries complained of; hence, he should not recover in this cause.

WILTERS & BRANTLEY

BY: *[Signature]*
Attorneys for Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY: *[Signature]*
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 6th day of December 1971, 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, and first class postage prepaid.

WILTERS & BRANTLEY

BY: *[Signature]*

FILED

DEC 6 1971

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9776

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon HUBERT LEE RACKARD
Route 3, Box 283-A
Atmore, 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.....

Hubert Lee Rackard....., Defendant.....

by WILLIAM REMILLONG.....

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

Witness my hand this 30th day of March 19 71

Emilee B. Blackmon Clerk

No.....

Page.....

**THE STATE OF ALABAMA
BALDWIN COUNTY**

CIRCUIT COURT

WILLIAM REMILLONG

Plaintiffs

vs.

HUBERT LEE RACKARD

Defendants

SUMMONS AND COMPLAINT

Filed **March 30** 19**71**

Clerk

J. CONNOR OWENS, JR.,

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Route 3, Box 283-A
Atmore, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

2498
no found
Hubert Lee Rackard

CP-1-P-11

WILLIAM REMILLONG,
Plaintiff,
vs.
HUBERT LEE RACKARD,
Defendant.

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

The Plaintiff, WILLIAM REMILLONG, claims of the Defendant, the sum of FIVE THOUSAND DOLLARS (\$5,000.00) damages for that heretofore, on, to-wit, December 2, 1970, the Defendant, Hubert Lee Rackard, so negligently operated a motor vehicle on U. S. Highway Number 90, a public road in Baldwin County, Alabama, at a point thereon approximately one-half mile West of Mileage Post No. 41, as to cause or allow the same to run into, upon and against a motor vehicle which the Plaintiff was then and there operating, and as a proximate consequence of the negligence of the Defendant, Hubert Lee Rackard, the Plaintiff was injured in this: his right rib was fractured; he received a whiplash injury to his neck; he was caused to incur medical bills and to undergo medical treatment; he was caused great pain and suffering and was caused to lose time from his work, wherefore, he brings this suit and asks judgment in the above amount.

J. Connor Owens, Jr.
J. Connor Owens, Jr.,
Attorney for Plaintiff.

FILED

MAR 30 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

CLERK
EMANCE B. BLACKMON CIRCUIT

MAR 30 1911

FILED

ATTORNEY FOR PLAINTIFF.
J. CARROLL OWENS, JR.
J. Carroll Owens, Jr.

the above amount.

from his work, wherefore he brings this suit and asks judgment in
was caused great pain and suffering and was caused to lose time
caused to incur medical bills and to undergo medical treatment; he
was fractured; he received a whiplash injury to his neck; he was
Joe Rackard, the Plaintiff was injured in this: his right rib
fractured consequent to the negligence of the Defendant, Hubert
vehicle which the Plaintiff was then and there operating, and as a
as to cause or allow the same to run into, upon and against a motor
whereon approximately one-half mile West of Mileage Post No. 41,
Number 30, a public road in Baldwin County, Alabama, at a point
Rackard, so negligently operated a motor vehicle on U. S. Highway
herebefore, on, to-wit: December 5, 1910, the Defendant, Hubert Joe
the sum of FIVE THOUSAND DOLLARS (\$2,000.00) damages for that
the Plaintiff, WILLIAM REMINGTON, claims of the Defendant.

F

Defendant.

HUBERT JOE RACKARD,

vs.

WILLIAM REMINGTON,

AT LAW.

BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF

150
\$40
\$9.90

Sheriff's Claims 1
miles in executing this
84 at 10c per

9776
Denial on
Hubert Joe Rackard

11-9-1911
WILLIAM REMINGTON

W. P. Byrd
W. P. Byrd
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