

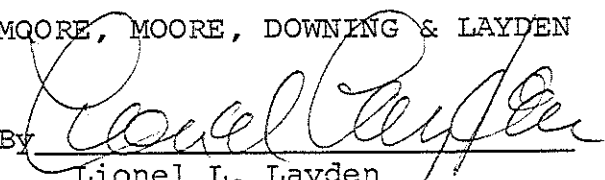
LEWIS B. GILMORE,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
JAMES MCGILL,)
Defendant.) CASE NO. 9816

The Plaintiff claims of the Defendant the sum of TEN THOUSAND AND NO/100 (\$10,000.00) DOLLARS damages for that heretofore on, to-wit: January 17, 1971, the Defendant so negligently operated the motor vehicle he was then and there driving on Alabama Highway 16 between Country Road 55 and Hinote Road, said highway and roads being public roads in the County of Baldwin, State of Alabama, so as to cause or allow the said motor vehicle to run into, over, upon or against the motor vehicle which the Plaintiff was driving, which automobile was also on said Alabama Highway 16 between Country Road 55 and Hinote Road at said place, and Plaintiff alleges that as a direct and proximate result of the said negligence of the Defendant the Plaintiff was injured as follows:

Plaintiff was badly bruised, lacerated, contused, strained and sprained; Plaintiff suffered an injury to his right knee; Plaintiff was permanently injured; Plaintiff was caused to suffer much pain; Plaintiff was caused to expend sums of money on doctor, hospital and medical expenses, and will be caused to incur such expenses in the future; Plaintiff's automobile was badly bent, broken and damaged, and the value thereof permanently depreciated; Plaintiff was caused to be without the use of his automobile for a great period of time; all to his damage, hence this suit.

MOORE, MOORE, DOWNING & LAYDEN

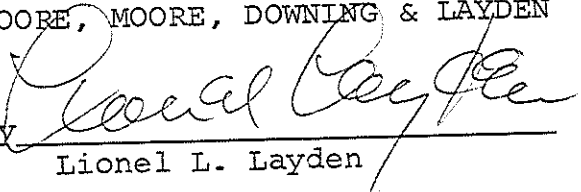
BY


Lionel L. Layden
Attorney for Plaintiff
920 Dauphin Street
Mobile, Alabama

plaintiff respectfully demands a trial by jury.

MOORE, MOORE, DOWNING & LAYDEN

By


Lionel L. Layden

Please serve:

James McGill
Route 1, Summerdale, Alabama

FILED

APR 30 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9816

TERM.

19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES MCGILL

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.....

JAMES MCGILL

Defendant.....

by LEWIS B. Gilmore

Plaintiff.....

Witness my hand this 30th day of April 1971

Ernest B. Blackmon Clerk

1. Dale Not Found

No. 9816.....

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

LEWIS B. GILMORE

Plaintiffs

vs.

JAMES MCGILL

Defendants

SUMMONS AND COMPLAINT

Filed April 30, 1971

Eunice B. Blackmon Clerk

Moore, Moore, Downing & Layden
Plaintiff's Attorney

Defendant's Attorney

444 27 1971

Defendant lives at
% Robert L. Wilkins Co

R. Dale

Received In Office

May 4 1971

Taylor Wilkins Sheriff

I have executed this summons

this 7-28 1971

by leaving a copy with

BR

James McGill

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY *H. A. Brown*
DEPUTY SHERIFF

Returned day of June 1971
Not found in Baldwin County after diligent search and in
Taylor Wilkins, Sheriff
Deputy Sheriff

Moore, Printing Co. - Bay Minette, Ala.

own R. Dale

LEWIS B. GILMORE,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY,
VS.	:	ALABAMA
JAMES McGILL,	:	AT LAW
Defendant.	:	CASE NO. 9816

P L E A S

Comes now the Defendant, JAMES McGILL, and for answer to the Complaint and to each and every count thereof, separately and severally, files the following separate and several pleas:

1. Not guilty.

2. For that at the time and place complained of in Plaintiff's Complaint, Plaintiff himself so negligently operated his said motor vehicle on Alabama Highway 16 between Country Road 55 and Hinote Road, said highway and roads being public roads in the County of Baldwin, State of Alabama, as to cause the same to collide with the said motor vehicle being operated by JAMES McGILL, and Defendant avers that Plaintiff's negligence, as aforesaid, proximately contributed to his own injuries and damages; hence, Plaintiff cannot recover herein.

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Defendant.

By: 

BROOX G. HOLMES

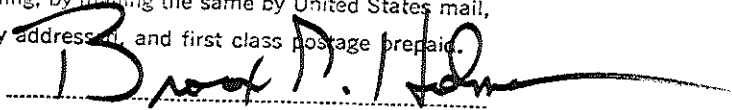
CERTIFICATE OF SERVICE

I do hereby certify that I have on this 3rd day of Aug, 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.

FILED

AUG 4 1971

EUNICE B. BLACKMON CIRCUIT CLERK



STATE OF ALABAMA)

COUNTY OF MOBILE)

A F F I D A V I T

Before me, the undersigned authority in and for said State and County, personally appeared LEWIS GILMORE and JANIE GILMORE, who are known to me, and who after first being duly sworn, did depose and say as follows:

Our names are Lewis Gilmore and Janie Gilmore and we are the father and mother of Eugene Gilmore, age fifteen (15), a minor, who is in our care and custody.

We are filing this affidavit with the Circuit Court of Baldwin County, Alabama for the purpose of withdrawing funds in the amount of One Hundred and No/100 (\$100.00) Dollars of which said sum was recovered by our son in Case no: 9817.

The said minor child is in need of the aforesaid funds and we do declare that we make this application for such withdrawal with full understanding and agreement that we will use the funds so withdrawn for the sole benefit of our said child, his support, maintenance and education, and that we will not use any of said funds for ourselves, any other person, or any other purpose.

IN WITNESS WHEREOF, we have hereunto set our hands and seals on this the 21st day of April, 1972.

Lewis B Gilmore (SEAL)
LEWIS GILMORE

Janie O Gilmore (SEAL)
JANIE GILMORE

SUBSCRIBED and SWORN TO before me
on this the 21st day of April, 1972.

Jeanette Linton
NOTARY PUBLIC, State of Alabama
at Large.

Parent's Address:
P. O. Box 629
Century, Florida

