EDDIE B. BRADLEY

* IN THE CIRCUIT COURT OF

Plaintiff

*

BALDWIN COUNTY, ALABAMA

vs

* AT LAW

ERVIN ZINK, INC., a corporation *

Defendant

Case No. 9833.

COUNT I

The plaintiff claims of the defendant the sum of SEVEN THOUSAND & NO/100 (\$7,000.00) DOLLARS as damages for that heretofore and on to wit: the 16th day of May, 1970, the plaintiff's minor son was operating a school bus on and along U.S. Highway 98 at a point to wit: 2 miles West of Foley, Baldwin County, Alabama, and where the plaintiff's minor son had a right to be, and then and there the defendant's truck was so/operated at said time and place by an agent, servant, or employee who was acting in the line and scope of his authority as such agent, servant or employee of the defendant, so as to run into, over, upon and against the school bus that the plaintiff's minor son was driving at said time and place, and as a proximate consequence of the negligence of the defendant, the plaintiff's minor son's body was crushed, and injured, which injuries caused the plaintiff to incur medical, doctor, hospital and ambulance bills. The plaintiff avers that all the medical, doctor, hospital and ambulance bills were a proximate consequence of the negligence of the defendant, agent, servant or employee, and that she is liable for these medical, doctor, ambulance and hospital bills and hence this suit.

FRED F. SMITH, JR.
Attorney for Plaintiff

W. ROBERTS WILSON, JR. Attorney for Plaintiff

The plaintiff demands a trial by jury in this cause.

FRED F. SMITH, JR.

SERVE DEFENDANT:

Ervin Zink. Inc 4729 Massachussetts Ave Indianapolis, Indiana

FILED

MAY 11 1971

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EUNICE B. BLACKMON CIRCUIT

THE STATE OF ALABAMA BALDWIN COUNTY

Circuit Court, Baldwin County

BALDWIN COUNTY	}	No9833	*****		
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You Are Hereby Commanded to Summon					
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o appear and plead, answer or demu					
filed in the Circuit Court of Baldwin Cour	nty, State	e of Alabama, a	at Bay Minette	against	
Ervin Zink, Inc., a corpo	oration			Defer	ıdant
by EDDIE B. BRADLEY		***************************************			
Witness my hand this 11th d		May			

No9833	Page		
THE STATE OF ALABAMA BALDWIN COUNTY			
CIRCUIT	COURT		
EDDIE B. BRADL	EY		
······································	Plaintiffs		
,	vs.		
ERVIN ZINK, IN	C., A CORPORATION Defendants		
SUMMONS AN	D COMPLAINT		
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Eunice B. Blac	kmon Clerk		
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Fred F. Smith W. Roberts Wi	, Jr. & 1sPihintiff's Attorney		

Defendant lives at SERVICE BY SECRETARY OF STATE Eryin Zink, Inc. MAY 14 1971 Mayelexeduled this summons this JATLO VALKINS by leaving a copy with Executed by serving ...the within on // Secretary of State of The State of Alabama. Sherkfi of Montgomery County M. S. Butler, M. S. Butler, Sheriff of Montgomery County, Alabama, Claim \$1.50 each for serving ____/ process(es) and \$1.00 rayel expense on each of ______ Sheriff

Moore Printing Co. - Bay Minette, Ala.

Defendant's Attorney

EDDIE B. BRADLEY
Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

VERSUS

NO. 9833

ERVIN ZINK

Defendant

MOTION FOR RELEASE OF EVIDENCE

Comes now the Plaintiff in the above styled and numbered case and moves this Honorable Court to enter an Order releasing the Exhibits introduced in said case on behalf of the Plaintiff and the Defendant and would show unto the Court the following, to-wit:

Ι

Plaintiff and Defendant have settled the said case and have satisfied the judgment of the Plaintiff against the Defendant, and the parties are in accord.

WHEREFORE Plaintiff by and through his attorney moves this Honorable Court to enter an Order releasing the said Exhibits, each to the respective attorneys, for the Plaintiff and the Defendant who introduced the said Exhibits.

Respectfully Submitted, Eddie B. Bradley

By: W. Roberts Wilson, Jr.,

her attorney

FILED

APR 9 1973

EUNICE B. BLACKMON CIRCUIT

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