

OTIS WASHINGTON

PLAINTIFF

Vs.

LEMEN SHEPARD

DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE No: 9982

COUNT ONE:

PLAINTIFF CLAIMS OF THE DEFENDANT THE SUM OF \$657.34 AS DAMAGES FOR THAT ON, TO-WIT, MARCH 6, 1971 THE DEFENDANT, WHILE OPERATING AND USING ONE 1968 GTO PONTIAC AUTOMOBILE, WHICH AUTOMOBILE WAS THE PROPERTY OF THE PLAINTIFF, WHICH AUTOMOBILE WAS THEN AND THERE BEING OPERATED FOR THE EXCLUSIVE BENEFIT OF THE DEFENDANT AND THE SAID AUTOMOBILE WAS THEN AND THERE UNDER THE EXCLUSIVE CONTROL OF THE DEFENDANT, OPERATED THE SAID AUTOMOBILE IN SUCH A NEGLIGENT MANNER AS TO CAUSE GREAT DAMAGES IN AND ABOUT THE AUTOMOBILE RESULTING FROM THE COLLISION OF SAID AUTOMOBILE WITH A POWER POLE, SAID DAMAGES BEING DESCRIBED AS DESTROYING THE RIGHT FRONT FENDER, THE RIGHT FRONT HEADLAMP ASSEMBLY, THE WINDSHIELD AND HOOD, ALL TO THE DAMAGE OF THE PLAINTIFF, IN THE AMOUNT OF \$657.34, FOR ALL OF WHICH THE PLAINTIFF CLAIMS DAMAGES AS AFORESAID.

COUNT TWO:

THE PLAINTIFF CLAIMS OF THE DEFENDANT DAMAGES IN THE AMOUNT OF \$657.34 FOR THAT ON, TO-WIT, MARCH 6, 1971, THE DEFENDANT DAMAGED AND DESTROYED THE PROPERTY OF THE PLAINTIFF, CONSISTING OF ONE 1968 GTO PONTIAC AUTOMOBILE, WHILE OPERATING THE SAME IN PRITCHARD, ALABAMA, BY RUNNING SAID AUTOMOBILE INTO A POWER POLE OR POST, AND DAMAGING THE RIGHT FRONT FENDER, RIGHT FRONT HEADLAMP, WINDSHIELD, HOOD AND FRONT BUMPER ALL TO THE DAMAGE OF THE PLAINTIFF AS AFORESAID, HENCE THIS SUIT.

COUNT THREE:

PLAINTIFF CLAIMS OF THE DEFENDANT THE SUM OF \$657.34 AS DAMAGES FOR THE PARTIAL DESTRUCTION OF THE PLAINTIFF'S AUTOMOBILE, A 1968 GTO PONTIAC, ON TO-WIT, MARCH 6, 1971, FOR THAT THE DEFENDANT RAN THE PLAINTIFF'S AUTOMOBILE INTO, OVER OR AGAINST A POST OR OTHER OBJECT UNKNOWN TO THE PLAINTIFF, CAUSING DAMAGES TO THE AFORESAID AUTOMOBILE IN THE SUM AFORESAID, HENCE THIS SUIT.

BAILEY & TAYLOR

By: *Shayd E Taylor*
ATTORNEYS FOR PLAINTIFF

FILED

AUG 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

We the jury
find for the
Plaintiff
in the
amount of
\$400⁰⁰
Wth R. Suplee.
FOREMAN

[Faint, illegible handwritten text]

[Faint, illegible typed text, likely a transcript of a trial or legal proceeding]

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9982

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LEMEN SHEPARD

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.....

LEMEN SHEPARD....., Defendant.....

by

OTIS WASHINGTON....., Plaintiff.....

Witness my hand this 10th day of AUGUST 19 71.

Emmie B. Blackmon..... Clerk

9982

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

OTIS WASHINGTON

Plaintiffs

vs.

LEMEN SHEPARD

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

FILED

AUG 10 1971

EUNICE B. BLACKMON CIRCUIT CLERK

BAILEY & TAYLOR, FAIRHOPE, ALA.

Plaintiff's Attorney

AUG 10 1971 Defendant's Attorney

BAILEY & TAYLOR
FAIRHOPE, ALA.

Defendant ~~KXXXX~~ MAY BE
SERVED AT HIS PLACE OF WORK
BALLARD FURNITURE
SPANISH FORT, ALABAMA

Received In Office

August 10 1971

Sheriff

I have executed this summons

this 11th day of Aug. 1971

by leaving a copy with

Lemen Shepard

Sheriff claims 4.5 miles at

Ten Cents per mile Total \$ 4.50

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred Seibert Deputy Sheriff
Sg. Fort

- ~~1. Tannison, Edith E., Housewife, 110 W. 3rd St. Bay Minette P¹~~
- ~~2. Thornton, Marion, Millwright Scott Paper Co., 424 Miller Av., Fairhope, Mobile D⁹~~
- ~~3. Wheeler, Mrs. O. C., Seely, Thomas Hospital, 54 Fairhope, Ave. Fairhope D⁴~~
- ~~4. White, Buford, Forester Int. Paper Co., 407 W. 4th St. Bay Minette, Mobile P¹~~
- ~~5. Richardson, Oscar G., Lineman Riveria Utilities, 109 Oak Av. Fairhope D⁶~~
- ~~6. Ruffles, Wm. R., Jr., V-Pres. Genl. Mgr. Ruffles Co., 117 Kiefer Av. Fairhope~~
- ~~7. Sanford, Marlin B., Insp. Ala. Dry Dock, 612 Belrose Av., Daphne, Ala. Mobile~~
- ~~8. Springer, Tommy, N.A.S., Robertsdale, Pensacola D¹⁶~~
- ~~9. Payne, Thomas P., Forester Int. Paper Co., 1601 Armstrong Av. Bay Minette P⁴~~
- ~~10. Langham, Francis, Housewife, Robertsdale, Ala. P⁸~~
- ~~11. Myrick, T. C., Retired, Gen. Del, 154 Gaston Av. Fairhope D¹~~
- ~~12. Malik, Theo, Prod. Controller PNAS 157 Pecan St. Fairhope, Pensacola D¹⁴~~
- ~~13. Ching, Timothy V., Mgr. Nat'l Butane Gas, 205 Pecan St. Fairhope D²~~
- ~~14. Clark, Nannie B., Housewife, 102 N. Hoyle Av. Bay Minette P¹⁰~~
- ~~15. Boiser, Carl W., Pipe Fitter Ala. Dry Dock, 752 Edwards Av. Fairhope, Mobile D¹⁰~~
- ~~16. Benton, Betty, Eastwood Nealy, 411 Byrne, St. Bay Minette P⁹~~
- ~~17. Carlisle, D. C., Newport, 315 Moog Av. Bay Minette~~
- ~~18. Lundberg, Bernice, Bay Slacks, Box 131 Bay Minette P¹²~~
- ~~19. Manglos, Mrs. H. C., Housewife, P. O. Box 1155, Foley, D¹²~~
- ~~20. Crow, Cleve, Labor, 50 Young St. Fairhope~~
- ~~21. Curtis, Robert E., Retired, 418 S. Section, Fairhope D⁷~~
- ~~22. Dean, Mildred S., Vanity Fair, Star Rt. Stockton, Atmore P¹⁰~~
- ~~23. Dean, Thomas, Forester, Rabun Rt. Bay Minette~~
- ~~24. Dees, Charles L., Aud. Ala. Power Co., 929 Sea Cliff Dr. Fairhope D⁵~~
- ~~25. Barnett, Delores B., Housewife, Rt. 4 Box 180 Cantonment, Fla. Gateswood P¹⁴~~
- ~~26. Bradford, Annette, Ofc. Bay Minette Housing, 7 Neighbor La. Bay Minette P⁵~~
- ~~27. Boone, Joy R., Housewife, 361 S. Church St. Fairhope~~
- ~~28. Blazi, Joseph F., Retired, 457 Dogwood Av. Fairhope D¹¹ D¹³~~
- ~~29. Andre, James L., Retired, Stockton, Bay Minette P⁶~~
- ~~30. Andrews, Jessie J., Jr., Linemn. S C B Tel. 1405 Main St. Daphne~~
- ~~31. Atkinson, David C., Jr., Sls. Rep. Sinclair Oil, 754 Coleman Blvd. Fairhope D³~~
- ~~32. Crabtree, Lois B., Housewife, 5 Bull Run Spanish Fort P³~~
- ~~33. Wurst, Anna L., Housewife, 711 E. 6th St. Bay Minette~~
- ~~34. Womack, Sylvia M., Clk, Sears Roebuck & Co. 306 Hickory St. Bay Minette P¹¹~~
- ~~35. White, Rudolph, Contractor, P. O. Box 136 Robertsdale,~~
- ~~36. White, Mitchell, Clerk, Bradley Mdw. Bay Minette P⁷ P¹⁵~~
- ~~37. Stephens, Mrs. Sarah E., Housewife, Robertsdale~~
- ~~38. McGante, Joe, Retired, 400 S. Section St. P. O. Box 214, Fairhope D⁸~~
- ~~39. Helms, Larry, Good Year Tire Store, Elberta, Foley~~
- ~~40. Hadding, Sarah L., Computer Programmer PNAS 120 Dineridge Rd. Daphne~~
- ~~41. Gooden, E.H., Retired, 114 Fairhope Av. Fairhope~~
- ~~42. Griffith, Mildred M., Housewife, 165 Pinecrest La. Fairhope D¹⁵~~
- ~~43. Sullivan, Edgar, Labor, 308 Fels Av. Foley P¹⁶~~
- ~~44. Sword, Mrs. Gertrude, Real Estate Office Sec. 401 S. Section St. Fairhope~~

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9982

OTIS WASHINGTON,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
VS.	)	AT LAW
LEMEN SHEPARD,	)	CASE NO. 9982
Defendant.	)	

ANSWER

Comes now the Defendant in the above styled cause and files the following Answer to the Plaintiff's Complaint:

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|-------------|----|
| | 1. |
| Not guilty. | |
| | 2. |
| Not guilty. | |
| | 3. |
| Not guilty. | |

WILTERS & BRANTLEY

BY: *S m Brantley*
Attorneys for Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY: *S m Brantley*
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 30 day of Aug 1971 served a copy of the foregoing Answer on counsel for all parties to this proceeding by mail in the by United States Mail, properly addressed, and a statement of postage prepaid.

WILTERS & BRANTLEY

By: *S m Brantley*

FILED

AUG 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK