

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 Ralph Ollen Garner and R. O. Garner, III. 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 Francine Williams Fors.

Witness my hand this 13 day of Oct, 1971.

Eunice B. Blackmon
Clerk

FRANCINE WILLIAMS FORS,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

BALDWIN COUNTY, ALABAMA

X

RALPH OLLEN GARNER and
R. O. GARNER, III.,

X

AT LAW 10,073

X

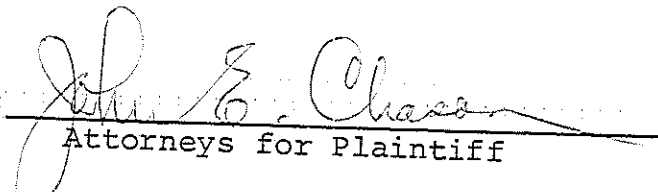
Defendants.

The Plaintiff claims of the Defendants, the sum of Fifteen Hundred Dollars (\$1500.00) as damages for that heretofore, on, to-wit, the 26th day of March, 1971, at a point on County Road 65 between the intersections of said road with County Road 12 and County Road 14 in Baldwin County, Alabama, the Defendant, Ralph Ollen Garner, who was at said time and place the agent, servant or employee of the Defendant, R. O. Garner, III., and acting within the line and scope of his authority as such agent, servant or employee at said time and place, did so negligently

operate a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate result of the negligence of the Defendants as aforesaid, the Plaintiff's vehicle was severely damaged in that the front bumper, grill, head lamps, radiator, hood, front fenders and the left door, together with various supporting parts, were all bent, damaged or broken and the value of the vehicle was permanently depreciated, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

Respectfully submitted,

CHASON, STONE & CHASON

BY: 
Attorneys for Plaintiff

Defendant R. O. Garner, III.
may be served at Gulf Shores,
Alabama.

Defendant Ralph Ollen Garner
may be served at 202 C
Michigan Avenue, Mobile, Alabama.

FILED

OCT 13 1971

EUNICE B. ELACKMON CIRCUIT
CLERK

Received 14 day of Oct 19 71
and on _____ day of _____ 19 ____
I served a copy of the within A+C
on R. O. Garner, III
By service on _____
TAYLOR WILKINS, Sheriff
By _____ D. S.

Sheriff claim _____ miles at
Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff
BY _____ DEPUTY SHERIFF
RETURNED 10-21-71
Not found in my County after diligent search and inquiry.
RAY D. BRIDGES, Sheriff
By W. J. Smith

Returned in my county after diligent search and inquiry.
By W. J. Smith
TAYLOR WILKINS, Sheriff
19 71

Baldwin
10, 073
8938
SW

FRANCINE WILLIAMS FORS,
Plaintiff,
vs.
RALPH OLLEN GARNER and R.
O. GARNER, III.,
Defendants.

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED
OCT 13 1971
EUNICE B. BLACKMON CIRCUIT CLERK
OCT 14 1971
JA. _____
CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

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 Ralph Ollen Garner and R. O. Garner, III. 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 Francine Williams Fors.

Witness my hand this 13 day of Oct., 1971.

Emmie B. Blackmon
Clerk

FRANCINE WILLIAMS FORS,

Plaintiff,

vs.

RALPH OLLEN GARNER and
R. O. GARNER, III.,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW 10,073

The Plaintiff claims of the Defendants, the sum of Fifteen Hundred Dollars (\$1500.00) as damages for that heretofore, on, to-wit, the 26th day of March, 1971, at a point on County Road 65 between the intersections of said road with County Road 12 and County Road 14 in Baldwin County, Alabama, the Defendant, Ralph Ollen Garner, who was at said time and place the agent, servant or employee of the Defendant, R. O. Garner, III., and acting within the line and scope of his authority as such agent, servant or employee at said time and place, did so negligently

operate a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate result of the negligence of the Defendants as aforesaid, the Plaintiff's vehicle was severely damaged in that the front bumper, grill, head lamps, radiator, hood, front fenders and the left door, together with various supporting parts, were all bent, damaged or broken and the value of the vehicle was permanently depreciated, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

Respectfully submitted,

CHASON, STONE & CHASON

BY:

John Earl Chason
Attorneys for Plaintiff

Defendant R. O. Garner, III.
may be served at Gulf Shores,
Alabama.

Defendant Ralph Ollen Garner
may be served at 202 C
Michigan Avenue, Mobile, Alabama.

FILED

OCT 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

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 Ralph Ollen Garner

and R. O. Garner, III. 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 Francine Williams Fors.

Witness my hand this 13 day of Oct - , 1971.

Francine B. Blackman
Clerk

FRANCINE WILLIAMS FORS,

Plaintiff,

IN THE CIRCUIT COURT OF

X

X

X

BALDWIN COUNTY, ALABAMA

X

RALPH OLLEN GARNER and

R. O. GARNER, III.,

X

AT LAW 10,073

X

Defendants.

The Plaintiff claims of the Defendants, the sum of

Fifteen Hundred Dollars (\$1500.00) as damages for that heretofore,

on, to-wit, the 26th day of March, 1971, at a point on County

Road 65 between the intersections of said road with County Road 12

and County Road 14 in Baldwin County, Alabama, the Defendant,

Ralph Ollen Garner, who was at said time and place the agent,

servant or employee of the Defendant, R. O. Garner, III., and

acting within the line and scope of his authority as such agent,

servant or employee at said time and place, did so negligently

operate a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate result of the negligence of the Defendants as aforesaid, the Plaintiff's vehicle was severely damaged in that the front bumper, grill, head lamps, radiator, hood, front fenders and the left door, together with various supporting parts, were all bent, damaged or broken and the value of the vehicle was permanently depreciated, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

Respectfully submitted,

CHASON, STONE & CHASON

BY: John Earle Chason
Attorneys for Plaintiff

Defendant R. O. Garner, III.
may be served at Gulf Shores,
Alabama.

Defendant Ralph Ollen Garner
may be served at 202 C
Michigan Avenue, Mobile, Alabama.

FILED

OCT 13 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

EXHIBIT 2
EXHIBIT 2
EXHIBIT 2

Oct 12 1931

FILED

Michigan Vehicle, Mobile, Victims.
may be served at 305 C
Defendant Ralph Olsen Garner

Victims.

may be served at 305 C
Defendant R. O. Garner, III.

EXHIBIT 2
EXHIBIT 2
EXHIBIT 2

EXHIBIT 2
EXHIBIT 2
EXHIBIT 2

CHRYSLER STONE & CHRYSLER

Respectfully submitted,

16

~~Auto~~ Baldwin

Ralph O. Garner

Michigan Ave.
NOT AT ADD

202 P
Mobile

and above mentioned, hence this suit.

damages, the plaintiff's vehicle was severely damaged in the
and the left door, together with various supporting bars, were

the front bumper, grill, head lamps, radiator, hood, front fenders

stones, the plaintiff's vehicle was severely damaged in that

as a proximate result of the negligence of the defendant as

upon or against a motor vehicle belonging to the plaintiff and

operate a motor vehicle as to cause or allow the same to run into,