

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

10,103

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commaned to summon T. J. GIBSON; JOHN DOE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association, who was operating the vehicle of T. J. Gibson on the date and the occasion of the action made the basis of this suit; RICHARD ROE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association who was legally responsible for the operation of the motor vehicle described herein at the time and place of the accident made the basis of this suit; 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 the above named, by ELIAS KREHLING, as Plaintiff.

WITNESS my hand this 5th day of November, 1971.

Eunice B. Blackman
Clerk, Circuit Court of Baldwin County,
Alabama.

*Dept address: Warden Convent Camp
Grove Hill, Alabama*

C O M P L A I N T

ELIAS KREHLING,

Plaintiff,

vs.

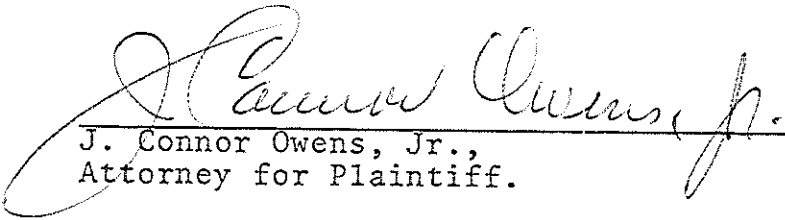
T. J. GIBSON;
JOHN DOE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association, who was operating the vehicle of T. J. Gibson on the date and the occasion of the action made the basis of this suit; RICHARD ROE, whose name to the Plaintiff is otherwise unknown and whose true name, when ascertained, will be substituted by amendment, being that person, firm, corporation, partnership or association who was legally responsible for the operation of the motor vehicle described herein at the time and place of the accident made the basis of this suit;

Defendants.

COUNT ONE:

The Plaintiff claims of the Defendants, the sum of FIVE THOUSAND DOLLARS (\$5,000.00) as damages for that on, to-wit, the 6th day of November, 1970, while the Plaintiff's vehicle was being operated along a public highway in Baldwin County, Alabama, at or near a point two miles West of the center of the Town of Foley, on U. S. Highway Number 98, the Defendants so negligently operated a motor vehicle so as to force Plaintiff's motor vehicle off of said highway and as a proximate consequence, the Plaintiff was injured and damaged as follows: his motor vehicle was severely damaged, broke, bent and torn and he was caused to lose the use of said vehicle for business purposes;

And Plaintiff alleges that all his said injuries and damages were caused as a proximate result of the negligence of the Defendants aforesaid in and about the operation of said motor vehicle at said time and place.


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

Plaintiff demands a trial of this cause by a Jury.

James C. [Signature]

Executed by serving copy of within on

J. H. [Signature]

Name

This the 11 day of Dec 1971

Ray Sheffield, Sheriff

By Joe B. [Signature], D.S.

FILED

NOV 5 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

THE SHERIFF CLAIMS 10

MILES AT 10¢ PER MILE FOR

A TOTAL OF \$ 1.00

Ray Sheffield SHERIFF

10,103 (D)
SUMMONS AND COMPLAINT

ELIAS KREHLING,

Plaintiff,

vs.

T. J. GIBSON, ET AL.,

Defendants.

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

I have executed this summons on
this the _____ day of _____,
1971, by leaving a copy with _____

FILED

NOV 5 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
DAHLBERG BUILDING
BAY MINETTE, ALABAMA

DEC 10 1971

TAYLOR WILKINS
SHERIFF

ELIAS KREHLING, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS: :
T. J. GIBSON, : AT LAW
Defendant. : CASE NO. 14,103

Comes the defendant T. J. Gibson and for answer to
the complaint heretofore filed says as follows:

1. Not guilty.

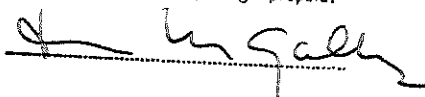
COLLINS, GALLOWAY & MURPHY

By:


THOMAS M. GALLOWAY
ATTORNEYS FOR DEFENDANT, T. J. GIBSON

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 5th
day of January, 1972 served a copy of
the foregoing pleading on counsel for all
parties to this proceeding by mailing the
same by United States Mail, properly ad-
dressed, and first class postage prepaid.



FILED

JAN 7 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

ELIAS KREHLING, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS: :
T. J. GIBSON, : AT LAW
Defendant. : CASE NO. 11,103

Comes the defendant T. J. Gibson and for answer to
the complaint heretofore filed says as follows:

1. Not guilty.

COLLINS, GALLOWAY & MURPHY

By: 

THOMAS M. GALLOWAY
ATTORNEYS FOR DEFENDANT, T. J. GIBSON

FILED

JAN 7 1972

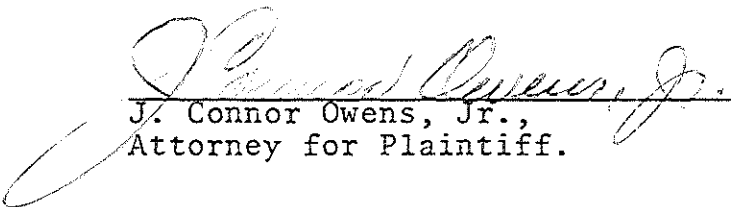
EUNICE B. BLACKMON CIRCUIT
CLERK

ELIAS KREHLING,)
)
Plaintiff,) IN THE CIRCUIT COURT OF
)
vs.)
) BALDWIN COUNTY, ALABAMA
T. J. GIBSON, ET AL.,)
)
Defendants.) AT LAW NO. 11,103
)

INTERROGATORIES:

Comes the Plaintiff in the above styled cause and desiring the testimony of the Defendant, T. J. Gibson, files with the Clerk of this Court the following Interrogatories to be propounded to the said Defendant and to be answered by the said Defendant:

1. Please state your name and address.
2. Please state your occupation on November 6, 1970.
3. Please state whether or not on said date you owned an automobile and if your answer is in the affirmative, please state the make, year and model and the License Registration Number of said automobile.
4. Please state whether on said date at approximately 7:20 o'clock A. M., said automobile was being operated in Baldwin County, Alabama, and if your answer is in the affirmative, please state whether said automobile was being operated at or near a point two miles West of the center of the Town of Foley, Alabama, on U. S. Highway No. 98.
5. If your answer to Interrogatory numbered 4 is in the affirmative, please state the name of the operator of said automobile at said time and place.
6. Please state whether at approximately 7:20 o'clock A. M., on November 6, 1970, you were an occupant of said automobile when the same was being operated at or near a point two miles West of the center of the Town of Foley, Alabama, on U. S. Highway No. 98.


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

STATE OF ALABAMA)
 (
BALDWIN COUNTY)

Before me, the undersigned Notary Public, within and for said State and County, personally appeared J. Connor Owens, Jr., who first being duly sworn, states that he is the Attorney for the Plaintiff in the foregoing cause and that the answers to the foregoing Interrogatories when well and truly made, will be material evidence for the Plaintiff in the trial of said cause.

J. Connor Owens, Jr.

Sworn to and subscribed before
me this 26th day of January, 1972.

Alice L. Miller

Notary Public, Baldwin County, Alabama.

FILED

JAN 26 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Dep

TO BE SERVED ON:
COLLINS, GALLOWAY & MURPHY
ATTORNEYS AT LAW
958 DAUPHIN STREET
MOBILE, ALABAMA

REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.
JAN 23 10 29 AM '72

Received 28 Day of Jan 72
and on 29 Day of Jan 72
I served a Copy of the within
on E. J. Bridges
by service on Mr. E. J. Bridges

RAY D. BRIDGES, Sheriff
By E. J. Bridges

Dep

915

INTERROGATORIES

ELIAS KREHLING,

Plaintiff,

vs.

T. J. GIBSON, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 11,103.

0312
Val.

FILED

JAN 26 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
DAHLBERG BUILDING
BAY MINETTE, ALABAMA

JAN 27 1972

JAN 27 1972
SHERIFF

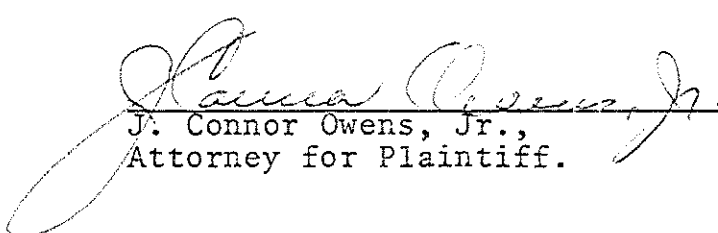
ELIAS KREHLING,)
Plaintiff,)
vs.)
T. J. GIBSON, ET AL.,)
Defendant.)
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 10,103.

NOTICE OF DEPOSITION:

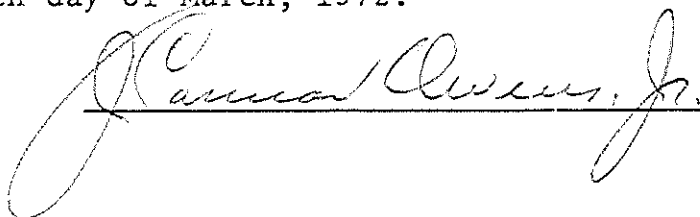
TO: MR. THOMAS M. GALLOWAY
ATTORNEY AT LAW
P. O. BOX 4492
MOBILE, ALABAMA 36601

You are hereby notified that the Plaintiff, Elias Krehling, will take the deposition of Mr. T. J. Gibson, the Defendant in this cause, at the Law Library located in the Baldwin County Courthouse in Bay Minette, Alabama, on Friday, March 17, 1972, at the hour of 10:00 o'clock A. M., before Mrs. Louise Dusenbury, or before some other officer authorized by law to take depositions. The deposition is to be taken in accordance with and pursuant to Act No. 375 of the Alabama Legislature of 1955, as amended, and will continue from day to day until the completion of the same, and you are invited to attend and examine the deponent.

DATED this 10th day of March, 1972.


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

I, the undersigned, Attorney of Record for the Plaintiff in the foregoing cause, do hereby certify that I have caused a copy of the foregoing notice to be served on Thomas M. Galloway, the Attorney of Record for the Defendant in said cause, by depositing the same in the United States Mail, properly addressed, with postage prepaid, this 10th day of March, 1972.



FILED

MAR 13 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

ELIAS KREHLING,)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
T. J. GIBSON, ET AL.,)	
Defendants.)	CASE NO. 10,103

AMENDED COMPLAINT:

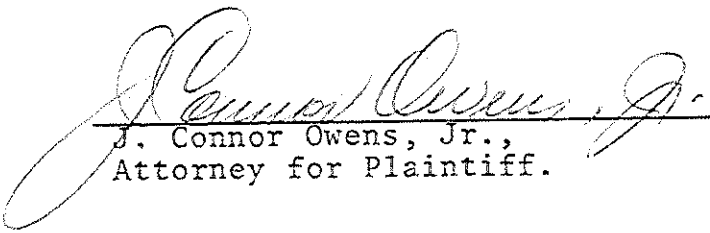
Now comes the Plaintiff in the above styled matter and amends the complaint heretofore filed, so that as amended, the same shall read as follows:

ELIAS KREHLING,)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
T. J. GIBSON,)	AT LAW. NO. 10,103.
Defendant.)	

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of SEVENTY FIVE HUNDRED DOLLARS (\$7500.00) as damages for that on, to-wit, the 6th day of November, 1970, while the Plaintiff's vehicle was being operated along a public highway in Baldwin County, Alabama, at or near a point two miles West of the center of the Town of Foley, on U. S. Highway Number 98, the Defendant so negligently operated a motor vehicle so as to force Plaintiff's motor vehicle off of said highway and as a proximate consequence, the Plaintiff was injured and damaged as follows: his motor vehicle was severely damaged, broke, bent and torn and he was caused to lose the use of said vehicle for business purposes;

And Plaintiff alleges that all his said injuries and damages were caused as a proximate result of the negligence of the Defendant aforesaid in and about the operation of said motor vehicle at said time and place.


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

Plaintiff demands a trial of this cause by a Jury.

J. Carson Owens, Jr.

I, the undersigned Attorney of Record for the Plaintiff in said cause, do hereby certify that I have caused a copy of the foregoing amended complaint to be served on Thomas M. Galloway, the attorney of record for the Defendant in said cause, by placing the same in the United States Mail, properly addressed, with postage prepaid, this 8th day of January, 1973.

J. Carson Owens, Jr.

FILED

JAN 9 1973

EUNICE B. BLACKMON CIRCUIT
CLERK

ELIAS KREHLING, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS: :
T. J. GIBSON, : AT LAW
Defendant. : CASE NO. 10,103

Comes now the defendant in the above styled matter
and for answer to the complaint, as amended, says as follows:

1. Not guilty.

COLLINS, GALLOWAY & MURPHY

By: *Thomas M. Galloway*
THOMAS M. GALLOWAY
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 15th
day of January 1973, caused a true and
correct copy of the foregoing pleading to be
mailed to the clerk of the court by
registered mail, return receipt
solicited, and first class postage prepaid.

Thomas M. Galloway

FILED

JAN 16 1973

EUNICE B. BLACKMON CIRCUIT
CLERK