

GREGORY McNALLY, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS. : CIVIL DIVISION
SAM JONES and BOBBY :
JONES, separately and :
severally, :
Defendants : No. 10,189

SUMMONS

STATE OF ALABAMA :

BALDWIN COUNTY :

TO ANY SHERIFF OF THE STATE OF ALABAMA-GREETINGS:

You are hereby commanded to summon SAM JONES and BOBBY JONES to be and appear before the Circuit Court of Baldwin County, Alabama, to be held in and for said County at the place of holding the same in the Baldwin County Court House in Bay Minette, Alabama, within thirty (30) days after the service of this process upon them, then and there to answer the complaint of GREGORY McNALLY.

WITNESS my hand this 11 day of Jan., 1972.

Eunice B. Blackmon
Clerk

FILED

JAN 11 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

GREGORY McNALLY,

Plaintiff,

VS.

SAM JONES and BOBBY
JONES, separately and
severally,

Defendants

:

:

:

:

:

:

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

CIVIL DIVISION

No. 10,189

COMPLAINT

COUNT ONE

Plaintiff claims of the Defendants, SAM JONES and BOBBY JONES, the sum of ONE THOUSAND FIFTY AND NO/100 (\$1,050.00) DOLLARS, as damages, for that heretofore on, to-wit, the 15th day of January, 1971, the Plaintiff was operating an automobile, the property of the Plaintiff, on a public highway in Baldwin County, Alabama, which said public highway was and is at the time of the matters complained of herein commonly known and designated as Alabama Highway 42, between Alabama Highway 16 and Patrician Drive, and at said time and place the Defendant SAM JONES, an agent, servant or employee of the Defendant BOBBY JONES, while acting within the line and scope of his employment as such, so negligently operated the motor vehicle which he was then and there driving as to negligently cause or allow the same to run into, upon and against the automobile which Plaintiff was operating, the property of the Plaintiff, as aforesaid. Plaintiff received abrasions about his left cheek and knee; Plaintiff incurred medical expenses in and about the treatment of his injuries and Plaintiff avers that as a direct and proximate result of the negligence of the Defendants, as aforesaid, Plaintiff's automobile was thereby wrecked, damaged on the left front and side and was bent, torn, smashed and otherwise rendered permanently less valuable, for all of which Plaintiff claims damages.

McDERMOTT, DEAS AND GROW
Attorneys for Plaintiff

Serve Defendants:
Sam Jones
1812 S. Cedar St.
Foley, Alabama
Bobby Jones
1812 S. Cedar St.
Foley, Alabama

By: 

THOMAS A. DEAS

805 Van Antwerp Building, Mobile, Alabama
433-1806

FILED
JAN 1 1972
JUNCE B. BLACKMON CLERK

Received 11 day of Jan 1972
and on 22 day of Jan 1972
I served a copy of the within 11
on Sam Jones & Bobby Jones
By service on _____
TAYLOR WILKINS, Sheriff
By Arthur L. Leonard, S.

Sheriff claims 2.40 12 40 12 40
Ten Cents per mile Total \$ 12.40
TAYLOR WILKINS, Sheriff
BY Arthur L. Leonard
DEPUTY SHERIFF

McMurtott, (as)
& Yron

EUNICE B. BLACKMON
Circuit Clerk

JAN 11 1972

FILED

Sam Jones & Bobby Jones, separately & severally -

vs:

Gregory Mc Nally

10.189 (4)

Extra Copy

GREGORY McNALLY,

:

IN THE CIRCUIT COURT OF

Plaintiff,

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BALDWIN COUNTY, ALABAMA

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JONES, separately and
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WITNESS my hand this _____ day of _____, 1972.

Clerk

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COMPLAINT

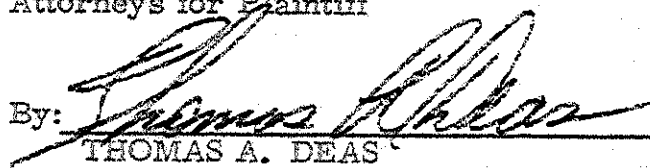
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McDERMOTT, DEAS AND GROW
Attorneys for Plaintiff

Serve Defendants:
Sam Jones
1812 S. Cedar St.
Foley, Alabama
Bobby Jones
1812 S. Cedar St.
Foley, Alabama

By:


THOMAS A. DEAS

805 Van Antwerp Building, Mobile, Alabama
433-1806

McDERMOTT, DEAS AND GROW

ATTORNEYS AT LAW

SUITE 805

VAN ANTWERP BUILDING

MOBILE, ALABAMA 36602

TELEPHONE 433-1806

January 10, 1972

EDWARD B. McDERMOTT
THOMAS A. DEAS
JOHN GROW

Ms. Eunice B. Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

Re: Gregory McNally vs. Sam Jones and
Bobby Jones

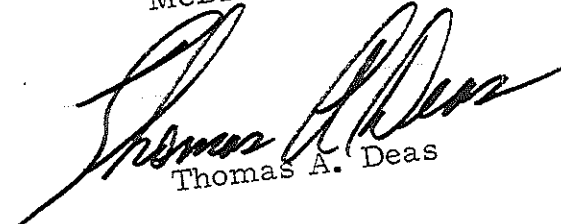
Dear Ms. Blackmon:

Please find herewith Summons and Complaint in the captioned matter. I would appreciate it if you would file same in your Court and acknowledge that you have received these papers.

Thanking you for your cooperation and with best regards, I remain,

Yours very truly,

McDERMOTT, DEAS AND GROW


Thomas A. Deas

TAD:gs
Enclosures

McDERMOTT, DEAS AND GROW

ATTORNEYS AT LAW

SUITE 805

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MOBILE, ALABAMA 36602

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EDWARD B. McDERMOTT
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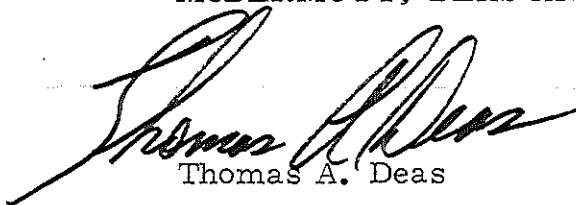
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