

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 A. G. Gowdy 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 Charles L. Prosser, a minor, suing by and through Elbert Prosser, his Father and next friend.

*Genice B. Blackman*  
~~By~~ Circuit Clerk

CHARLES L. PROSSER, a  
minor, suing by and through  
ELBERT PROSSER, his Father  
and next friend,

Plaintiff,

vs.

A. G. GOWDY,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,343

COUNT ONE:

The Plaintiff claims of the Defendant the sum of One Thousand Dollars (\$1,000.00) as damages for that heretofore on, to-wit, the 28th day of October, 1971 at a point on McMeans Avenue at the intersection of Ellis Street in the City of Bay Minette, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to collide with a motor vehicle belonging to the Plaintiff and as a proximate result of such negligence of the Defendant, the Plaintiff received

severe personal injuries consisting of cuts, bruises and abrasions to his arms, legs and various other parts of his body. He was made sick, sore and lame for a period of time and caused to incur hospital and medical bills and expenses and endured pain and suffering, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Two Hundred Fifty Dollars (\$250.00) as damages for that heretofore on, to-wit, the 28th day of October, 1971 at a point on McMeans Avenue at the intersection of Ellis Street in the City of Bay Minette, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to collide with a motor vehicle belonging to the Plaintiff and as a proximate result of such negligence of the Defendant, the Plaintiff's motor bike was damaged in that the front wheel and its assembly and handle bars were bent, damaged or broken to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

BY: John E. Chason

Defendant may be served  
at Newport Parkway  
Bay Minette, Alabama.

FILED

APR 10 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

# 10,343

CHARLES L. PROSSER, et. al.,  
Plaintiff,

VS.

A. G. GOWDY,  
Defendant.

\* \* \* \* \*

SUMMONS AND COMPLAINT

\* \* \* \* \*

APR 11 1972

RECEIVED

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

Received at Bay Minette, Alabama on April 10, 1972  
and on April 12, 1972  
I served a copy of the within on A. G. Gowdy  
on April 12, 1972  
By service on ~~the within~~  
TAYLOR WILKINS, Sheriff  
E. W. G. G. G.

Sheriff claims  
Ten Cents per mile Total \$  
TAYLOR WILKINS, Sheriff  
BY ~~the within~~

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 10,343

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause and each count thereof, separately and severally, says, separately and severally:

1. Not guilty.

~~Attorney for Defendant~~

FILED

APR 25 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK