IN THE CIRCUIT COURT OF L. B. STUCKEY) BALDWIN COUNTY, ALABAMA PLAINTIFF (AT LAW VS TOE LEAVEN DAW X CASE NO: 10, 361 DEFEN DANT

COMPLAIN T

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY EIGHT AND 34/100 (\$338.34) DOLLARS as damages for that, heretofore on, to-wit, June 26, 1970, the Defendant, Joe Leaven Daw, so negligently operated a motor vehicle on Milwaukee Street, a public street, within the town of Robertsdale, Alabama, so as to cause said motor vehicle to run into and against a vehicle being operated at said time and said place by Pearl Keith, thereby causing the automobile being operated by Pearl Keith to collide with the Defendant's automobile which was parked in front of the discount store in Robertsdale, Alabama, and as a proximate result of the negligence of the Defendant as aforesaid, Plaintiff's automobile was severely damaged and bent in the rear portion, all to his damage in the sum as aforesaid, hence this suit.

torney for Playhtiff

Defendant may be served:

In back of Alabama Salvage Silverhill, Alabama

FILED

APR 2 1 1972

EUNICE B. BLACKMON CIRCUIT

STATE	OF	ALAE	BAMA	(Circuit Co	ourt, Bal	dwin Co	unty
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STATE OF ALA BALDWIN COU	· .
CIRCUIT COU	₹T
L. B. Sullivan	
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	Plaintiffs
VS.	
Joe Leaven Daw	Defendants
SUMMONS AND COM	MPLAINT
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	Clerk
APR 2 1 1972	

EUNICE B. BLACKMON CIRCUIT CLERK

Taylor Wilkins, Jr.

Plaintiff's Attorney

Defendant's Attorney

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Behind Alabama Salvage Silverhill, Alabama

Received In Office

APR 2.1 1972

Sheriff
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by leaving a copy with

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HABTaylar Wicker Sheriff

14. 13 KOTEL Deputy Sheriff

L. B. STUCKY

IN THE CIRCUIT COURT OF

Plaintiff

BALDWIN COUNTY, ALABAMA

VS

AT LAW

JOE LEAVEN DAW

Defendant

CASE NO. 10,361

ANSWER

l.

The Defendant for answer to the Complaint, saith that the action for alleged negligence is barred by the Statute of Limitations for 1 year.

WILTERS, BRANTLEY & NESBIT

Defendanť

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 24 day of May 19/2 served a copy of the feregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

FILED

MAY 24 18/2

EUNICE B. BLACKMON GIRCUIT