

CARLOS COOPER

Plaintiff

VS.

FRANK DUBOSE and

WOODHAVEN DAIRY,
A Corporation

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,435

1.

The Plaintiff claims of the Defendants the sum of FOUR HUNDRED DOLLARS (\$400.00) as damages for that heretofore on to-wit, June 6, 1972, the Plaintiff was driving an automobile in a Northerly direction along or upon U. S. Highway #90 which is a public highway in Baldwin County, Alabama, and at or near the Midway Truck Stop between Loxley and Robertsdale, Alabama. At this time and place, Frank Dubose, who was then and there acting as the agent, servant or employee of Woodhaven Dairy, a Corporation, and while acting within the line and scope of his employment as such agent, servant or employee, so negligently operated the vehicle he was driving as to cause or allow the same to run into the automobile being driven by the Plaintiff; as a direct and proximate consequence and result of said negligence, the Plaintiff's vehicle was damaged as follows: The right rear fender was scraped and bent and the rear bumper was bent, all to the damage of the Plaintiff as aforesaid.

WILTERS, BRANTLEY & NESBIT

BY: Thylo J. Nesbit

Attorney for Plaintiff

FILED

JUN 5 1972

EUNICE B. BLACKMON CIRCUIT CLERK

Circuit Court, Baldwin County

THE STATE OF ALABAMA
BALDWIN COUNTY

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Frank Dubose and Woodhaven Dairy,
A Corporation.....

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.....

Frank Dubose and Woodhaven Dairy, a Corporation Defendant.....
by Carlos Cooper

Witness my hand this 6 day of June 19 72.

June

19.72.

Emmie B. Blakemen Clerk

13-Dale

No. 10,435

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

CARLOS COOPER

Plaintiffs

vs.

Frank Dubose and Woodhaven
Dairy, a Corp.

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

JUN 5 1972 Clerk

EUNICE B. BLACKMON CIRCUIT
CLERK

JUN 8 1972

TAYLOR WILKINS
SHERIFF

WILTERS, BRANTLEY & NESBIT

BY:

RECEIVED

Plaintiff's Attorney

JUN 8 1972

Defendant's Attorney

TAYLOR WILKINS
SHERIFF

Defendants ~~Shirley~~ may be
served at Woodhaven
Dairy, Robertsedale, Ala.

Received In Office

JUN 8 1972

19.....

TAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this **6-12** 19**72**

by leaving a copy with

Frank Dubose
Woodhaven Dairy
by service on:
Mildred Smart

TAYLOR WILKINS, Sheriff
BY **McNeil**
DEPUTY SHERIFF

Sheriff claims **100** miles at
Ten Cents per mile Total \$ **10.00**
TAYLOR WILKINS, Sheriff
BY **Brown**
DEPUTY SHERIFF

Taylor Wilkins Sheriff
WJBrown Deputy Sheriff
CA, memo 7-13-72

Moore Printing Co. - Bay Minette, Ala.

50 mi RT
R-Dale