

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Eula Lee Thornton 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 Thelma M. White.

Witness my hand this 6th day of July, 1972.

Ernie B. Blackmon
Clerk

THELMA M. WHITE,

Plaintiff,

vs.

EULA LEE THORNTON,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

10,478

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Hundred and Fifty Dollars (\$250.00) as damages for that, heretofore, on to-wit, the 28th day of October, 1971, at a point on the Old Daphne Road at its intersection with Hurricane Road in the City of Bay Minette, Baldwin County, Alabama, the Defendant did so negligently operate a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a direct and proximate result of said negligence


as aforesaid the Plaintiff's automobile was bent, damaged or broken and that its left front fender, wheel and door was bent, damaged or broken and said automobile was permanently depreciated in value.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) as damages for that, heretofore, on to-wit, the 28th day of October, 1971, at a point on the Old Daphne Road at its intersection with Hurricane Road in the city of Bay Minette, Baldwin County, Alabama, the Defendant did so negligently operate a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a direct and proximate result of said negligence as aforesaid the Plaintiff was personally injured in that she was bruised and contused on and about various parts of her body and she was caused to incur medical bills and expenses and she was temporarily disabled, resulting in loss of wages from her gainful employment and she endured pain and suffering all as a direct and proximate result of the negligence of the Defendant as aforesaid, in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

BY:


Attorneys for Plaintiff

Defendant may be served at:

306 East Ellis Street
Bay Minette, Alabama

FILED

JUL 6 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

306 E Ellis St

Received 7 day of July 1972
End on 17 day of July 1972
I served a copy of the within on Eula Lee Thornton

Sheriff claims _____ miles at _____
Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff
BY _____ DEPUTY SHERIFF

By service on _____
TAYLOR WILKINS Sheriff
By W. A. Zolner S.

10,478

THELMA M. WHITE,
Plaintiff,

VS.

EULA LEE THORNTON
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED

JUL 6 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

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