

BOYCHER FORE,) IN THE CIRCUIT COURT OF
Plaintiff) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
EUGENE LUCIOUS, JR.,)
Defendant) CASE NO. 16,636

C O M P L A I N T

COUNT I

Plaintiff claims of the defendant the sum of \$567.19 for that heretofore on, to-wit, the 5th day of August, 1972, the defendant so negligently operated an automobile on a public right-of-way, to-wit, Daphne Avenue in the community of Belforest, Baldwin County, Alabama, that the same was run off of said public road onto the property of the plaintiff and was run into or against the automobile belonging to the plaintiff and as a proximate consequence thereof the plaintiff's car was negligently damaged in that the front end was completely ruined, the frame was bent, and it needed painting, and the plaintiff has lost the use of his automobile; and the plaintiff avers that he suffered said damages as a proximate consequence of the aforesaid negligence of the defendant.


DANIEL A. BENTON, Attorney for Plaintiff

Defendant can be served at
his residence at

Route 1, Daphne, Alabama

or at his place of employment
which is the

International Longshoremen's
Association in Mobile, Alabama

FILED

OCT 6 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

October 3, 1972

Mrs. Eunice Blackmon
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Re: Boycher Fore v. Eugene Lucious, Jr.

Dear Mrs. Blackmon:

Enclosed are suit papers in the subject matter. Please process.

Thank you.

Yours very truly,


Daniel A. Benton

DAB:w
Enc.

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,634

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EUGENE LUCIOUS, JR.

.....
.....
.....

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.....

EUGENE LUCIOUS, JR...... Defendant.....

by

BOYCHER FORE..... Plaintiff.....

Witness my hand this 6 day of Oct 19 72

Emice B. Blackmon, Clerk

No. 10.1634

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BOYCHER FORE

Plaintiffs

vs.

EUGENE LUCIOUS, JR.

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

FILED

OCT 6 1972

EUNICE B. BLACKMON CIRCUIT
CLERK J

RICHARBY & BENTON
Fairhope, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Route 1, Daphne, Alabama
and works at
International Longshoremen's
Association in Mobile, Alabama

RECEIVED

OCT 13 1972

19.....

Sheriff

TAYLOR WILKINS
I have executed this summons
SHERIFF

this Oct. 7 1972

by leaving a copy with

Eugene Lucious, Jr.

Sheriff claims 54 rolls of

Den Cents per roll Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY Johnson
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Donald P. Johnson Deputy Sheriff

Serve in Daphne H.W. (31)