

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. C. CRUTCHFIELD 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 the same, then and there to answer the complaint of RALPH E. HUGGINS.

WITNESS my hand, this 14 day of May, 1954.

Reece J. Huggins
Clerk

RALPH E. HUGGINS

PLAINTIFF

VS

H. C. CRUTCHFIELD

DEFENDANT

Q

Q

Q

Q

Q

1.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED (\$1200.00) DOLLARS as damages for that heretofore on, to-wit, November 19, 1953, the Plaintiff was operating his automobile along Alabama Highway No. 31, a public highway in Baldwin County, Alabama, at approximately 3 miles South of Bay Minette, in Baldwin County, Alabama, that at said time and place the Defendant, H.C. Crutchfield so negligently operated his truck as to cause it to run into or against the automobile of the Plaintiff and as a proximate result of said negligence the Plaintiff's automobile was damaged as follows: the hood was mashed and twisted; the right front fender was bent; the right door was mashed; the whole right side of the car was bent and mashed in; the paint was scraped off the right side of the automobile; the frame was bent and twisted; rendering the Plaintiff's automobile less valuable all to the loss of the Plaintiff in the aforesaid amount.

2.

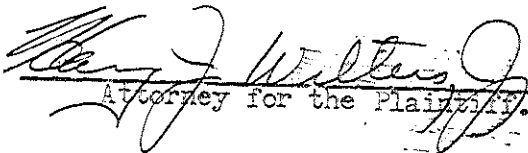
The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED (\$1200.00) DOLLARS, as damages for that heretofore, to-wit, November 19, 1953, the Plaintiff was operating his automobile along Alabama Highway No. 31, a public highway in Baldwin County, Alabama, approximately 3 miles South of Bay Minette, in Baldwin County, Alabama; that at said time and place the

Defendant so negligently operated an automobile which he was driving along said highway at said time and place so as to cause it to run into or collide with the said automobile of the Plaintiff and as a proximate result of said negligence of the Defendant the Plaintiff's automobile was damaged as follows: the hood was mashed and twisted; the right front fender was bent; the right door was mashed; the whole right side of the car was bent and mashed in; the paint was scraped off the right side of the automobile; the frame was bent and twisted; rendering the Plaintiff's automobile less valuable all to the loss of the Plaintiff in the aforesaid amount.

3.

The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED (\$1200.00) DOLLARS, as damages, for that heretofore, on to-wit, November 19, 1953, the Plaintiff was lawfully driving the Plaintiff's automobile along and upon a public highway in Baldwin County, Alabama, a place where he had a right to be, to-wit, U. S. Highway numbered 31, about 3 miles South of the Town of Bay Minette, Alabama, and that then and there the Defendant, ~~H. C. Crutchfield did wantonly run the automobile he was driving into the~~ Plaintiff's automobile and as a direct proximate consequence and result of said wanton act the Plaintiff's automobile was wantonly damaged as follows: The hood was mashed and twisted; the right front fender was bent; the right door was mashed; the whole right side of the car was bent and mashed in; the paint was scraped off the right side of the automobile; the frame was bent and twisted; rendering the Plaintiff's automobile less valuable all to the loss of the Plaintiff in the aforesaid amount.

Walters & Brantley,


Attorney for the Plaintiff.

Defendant's Address is:

H. C. Crutchfield
Route 2
Theodore, Ala.

Defendant so negligently operated an automobile which he was driving along said highway at said time and place so as to cause it to run into or collide with the said automobile of the Plaintiff and as a proximate result of said negligence of the Defendant the Plaintiff's automobile was damaged as follows: the hood was mashed and twisted; the right front fender was bent; the right door was mashed; the whole right side of the car was bent and mashed in; the paint was scraped off the right side of the automobile; the frame was bent and twisted; rendering the Plaintiff's automobile less valuable all to the loss of the Plaintiff in the aforesaid amount.

3.

The Plaintiff claims of the Defendant the sum of TWELVE HUNDRED (\$1200.00) DOLLARS, as damages, for that heretofore, on to-wit, November 19, 1953, the Plaintiff was lawfully driving the Plaintiff's automobile along and upon a public highway in Baldwin County, Alabama, a place where he had a right to be, to-wit, U. S. Highway numbered 31, about 3 miles South of the Town of Bay Minette, Alabama, and that then and there the Defendant, H. C. Crutchfield did wantonly run the automobile he was driving into the Plaintiff's automobile and as a direct proximate consequence and result of said wanton act the Plaintiff's automobile was wantonly damaged as follows: The hood was mashed and twisted; the right front fender was bent; the right door was mashed; the whole right side of the car was bent and mashed in; the paint was scraped off the right side of the automobile; the frame was bent and twisted; rendering the Plaintiff's automobile less valuable all to the loss of the Plaintiff in the aforesaid amount.

Wilters & Brantley,

Attorney for the Plaintiff.

Defendant's Address is:

H. C. Crutchfield
Route 2
Theodore, Ala.

I enclose herewith

19
....., Alabama.

Please serve and return as early as possible.

Myron Wilkins
Sheriff Baldwin County Alabama.

(If not found in your county please advise promptly giving information as to present location if possible)