

11. That said Complaint fails to set out the number of bushels or the type of corn or the kind of corn that was destroyed.

12. That said Complaint does not set out what harness was damaged.

Charles Stone
Attorneys for Defendant.

FILED

7-23-54

ALICE J. DUCK, Clerk

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Joe R. Wiggins to appear within 30 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 W. M. Patterson.

WITNESS my hand on this the 29th day of June, 1954.

Devin J. Smith
Clerk

W. M. PATTERSON,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS)	BALDWIN COUNTY, ALABAMA
)	
JOE R. WIGGINS,)	AT LAW
)	
Defendant.)	

COMPLAINT

Plaintiff claims of the Defendant the sum of One Thousand Dollars (\$1000.00) as damages for that, on, to-wit, 23rd day of November, 1953, the Plaintiff's horse and wagon, together with a load of corn, was lawfully traveling upon the public highway leading from Stockton to Uriah, and at a point approximately 100 yards South of Pine Log Creek in Baldwin County, Alabama, and while Plaintiff's said horse and wagon was being driven along said public highway at said time and place by Leonard Bohannon, who was then and there the agent, servant or employee of W. M. Patterson, the Plaintiff in this cause, and who was then and there acting within the right and scope of his authority as said agent, servant or employee, Defendant, who was driving an automobile on said public highway in the same direction Plaintiff was traveling, so negligently operated his said automobile as to cause it to strike, run upon or against the horse and wagon of said Plaintiff, and as a proximate

consequence of Defendant's negligence, Plaintiff's horse and wagon were thrown from said highway into a ditch, his horse was killed, his wagon was completely demolished, his load of corn was completely destroyed and his harness was irreparably damaged, all to Plaintiff's damages as aforesaid.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of said cause by jury.

J. B. Blackburn
Attorney for Plaintiff

The Defendant resides at Frisco City, Alabama.

FILED

6-29-54

ALICE J. BUCK, Clerk

Received in Sheriff's Office
this 29 day of June 1954
TAYLOR WILKINS, Sheriff

W2303

Executed by serving
A copy of the within
summons & complaint
on J. A. Wiggins
this 8 day July 1954

~~S. E. Nicholas~~
Sheriff

W. M. PATTERSON,

Plaintiff,

VS

JOE R. WIGGINS,

Defendant.

7-8-54

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED
JUN 29 1954
ALICE J. DUCK, Clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA