

STATE OF ALABAMA:

COUNTY OF BALDWIN:

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Clyde V. Thompson to appear within thirty days from the service of this writ in the Circuit Court, to be held in said county, at the place of holding same, then and there to answer the complaint of John M. Phillips.

Witness my hand this 19 day of Aug, 1954

Alice J. Duck
Clerk

JOHN M. PHILLIPS,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA
-vs-	*	AT LAW
CLYDE V. THOMPSON,	*	NO. <u>2362</u>
Defendant.	*	

COUNT ONE

Plaintiff claims of the Defendant the sum of, to-wit, One thousand and NO/100 (\$1000.00) Dollars, damages for that heretofore on to-wit, the 25th day of June, 1954 the Defendant so negligently operated a motor vehicle on the Bay Bridge Causeway at a point approximately 1.8 miles East of the Tensaw River Bridge, which said Causeway at said point was then a public highway in Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, on, over, against, or upon the automobile of the Plaintiff, which said automobile was then and there being operated in an Eastwarily direction on said Highway, and as a proximate consequence of the Defendant's negligent operation of said motor vehicle, at said time and said place, the automobile of the Plaintiff was badly bent, broken, smashed, and otherwise damaged, hence this suit.

Alexander T. Tamm
Attorney for Plaintiff

Plaintiff respectfully demands trial by jury.

Alexander T. Tamm
Attorney for Plaintiff

Defendant's address:
Bay Minette, Alabama

FILED

8-19-54

ALICE J. DUCK, Clerk

JOHN M. PHILLIPS,

PLAINTIFF

VS

CLYDE V. THOMPSON

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

It is agreed between the parties to the above styled cause:

1. That the following judgment by consent be entered:

"Judgment by consent for the plaintiff against the defendant in the sum of \$830.00, with stay of execution as provided by agreement between the parties on file in this cause. Execution to issue on the conditions and at the time provided in such agreement."

2. That the defendant pay the said judgment \$300.00 cash upon entry of judgment and the balance at the rate of \$50.00 a month commencing six months from date.

3. That execution on said judgment be stayed so long as the agreement for payment provided in paragraph two shall be kept, but in the event of default in the payment of the judgment as provided in paragraph two execution shall issue upon request of plaintiff's attorney.

Alexander Thompson
Attorney for Plaintiff

BEEBE & SWEARINGEN

BY *W. P. Beebe*
Attorneys for Defendant

Filed
9-30-54
W. P. Beebe
cur

ALEXANDER FOREMAN, JR.
ATTORNEY AT LAW
SUITE 214 FIRST NATIONAL BANK ANNEX
MOBILE 13, ALABAMA

ALEXANDER FOREMAN, JR.
JOSEPH M. HOCKLANDER
GEORGE K. WILLIAMS, JR.

August 16, 1954

Hon. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: John M. Phillips vs.
Clyde V. Thompson

Dear Mrs. Duck:

Enclosed herewith is a summon and complaint in duplicate which I shall appreciate your causing to be filed in the Circuit Court of Baldwin County. Please advise me when service on the defendant is obtained and of any pleadings filed in this matter.

Very truly yours,

ALEXANDER FOREMAN, JR.

By: *George K. Williams Jr.*
George K. Williams, Jr.

GKWJr/wd
Encl.