

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 Dorothy Bianchi, As Executrix of the Estate of Paul Bianchi, Deceased, 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 Lee Callaway, Doing business under the firm name and style of Gulf-Lagoon Fish Company.

Witness my hand this 11th day of October, 1954.

David J. Hensley
 Clerk.

LEE CALLAWAY, Doing business
 under the firm name and style
 of Gulf-Lagoon Fish Company,

Y

Y

Plaintiff,

Y

vs.

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

DOROTHY BIANCHI, As Executrix
 of the Estate of Paul Bianchi,
 Deceased,

Y

AT LAW

Y

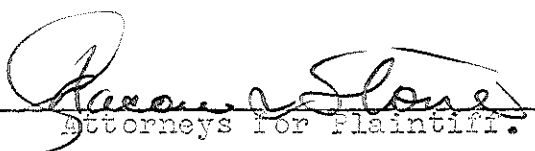
Defendant.

Y

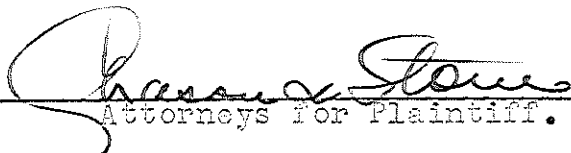
COUNT ONE:

The Plaintiff claims of the Defendant the sum of Two Thousand and 81/100 Dollars (\$2000.81) as damages for that, on to-wit, May 3, 1954, at about 8:30 o'clock a.m. the Defendant's testate, Paul Bianchi, negligently drove an automobile into, upon or against an automotive truck owned by the Plaintiff, at the intersection of Greeno Road and Fairhope Avenue, in Fairhope, Alabama, said collision occurring on a public highway in Baldwin County, Alabama, and as a proximate result of the negligence of the Defendant's testate, Paul Bianchi, the Plaintiff's said truck was damaged in this: its hood, grill, right front fender, right door, cab, and right side of truck body was bent, and badly broken; its engine was damaged and its frame was bent and its right head light was broken. Plaintiff further avers

that at the time of said collision his truck was loaded with fish known as snappers, which were the property of the Plaintiff and which were of the value of Five Hundred Eighty-five Dollars (\$585.00) were thereby rendered unfit for human consumption. Plaintiff further avers that his truck was being used in his business and he was caused to lose the use of such truck for approximately thirty (30) days and during said period of time it was necessary that he rent U-Drive-It trucks to haul his products and Plaintiff further avers that the negligence of the Defendant's testate, Paul Bianchi, was the proximate cause of the damages to the Plaintiff as above set out, hence this suit.


Attorneys for Plaintiff.

Plaintiff demands a trial of this cause by a jury.


Attorneys for Plaintiff.

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Filed day of Oct, 1954
TAYLOR WILKINS, CLERK

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11-22-54
Not found in this County
Chas. Shanker
Deputy Sheriff

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D.S.

LEE CALLAWAY, Doing business under
the firm name and style of Gulf-
Lagoon Fish Company,

Plaintiff,

vs.

DOROTHY BIANCHI, as Executrix of
the Estate of Paul Bianchi, De-
ceased,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Filed this 11th day of October,
1954.

David J. Search
Clerk.

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA