

2438

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 Joseph Cox to appear with-
in 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 Donald E. Burtschi.

Witness my hand this 8 day of November, 1954.

Walter J. Burtschi
Clerk.

DONALD E. BURTSCHI,

Plaintiff,

vs.

JOSEPH COX,

Defendant.

I

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Five Hun-
dred Dollars (\$500.00) as damages for that on heretofore, to-wit,
March 27, 1954, the Defendant so negligently operated a motor vehicle
at the intersection of Fairhope Avenue and Greeno Boulevard, public
streets located in Baldwin County, Alabama, as to cause or allow the
same to collide with the motor vehicle of the Plaintiff and as a
proximate consequence and result of the negligence of the Defendant
aforesaid, the automobile of the Plaintiff was greatly damaged in
this: the hood was bent, the front fenders were bent and broken,
the grill was bent, smashed and broken, the headlights and front
bumper were bent and broken, the radiator was broken, all to the
damage of the Plaintiff, wherefore he brings this suit and asks
judgment in the above amount.

CHASON & STONE

By:

Malcolm S. Stone
Attorneys for Plaintiff.

RECORDED

9:40 PM

720 2438

received 8 day of Nov 1952
and on 10 day of Dec 1952
I serve a copy of the within Complaint
on Sumner

BY SERVICE OF Joseph Cox

TAYLOR WILKINS, Sheriff
BY Geo Sawyers

DONALD E. BURTSCHT,

Plaintiff,

vs.

JOSEPH COX,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED

11-8-52

ALICE L. BUCK, CLERK
LAW OFFICES

CHASON & STONE
BAY MINETTE, ALABAMA