

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Eddie Goodlett, 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 Willie Thomas.

Witness my hand this 23 day of November, 1954.

[Signature]
Clerk.

WILLIE THOMAS,

PLAINTIFF,

VS

EDDIE GOODLETT,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

I.

The Plaintiff claims of the Defendant the sum of Three Hundred (\$300.00) Dollars, as damages for that heretofore, on to-wit, Tuesday, June 29, 1954, at about 4:00 P. M. on the Pine Grove Road, a public highway in Baldwin County, Alabama; to-wit, three miles from Bay Minette, Alabama, the Defendant so negligently operated an automobile truck, which he was then and there driving as to run said automobile truck into, over or against an automobile operated by the Plaintiff herein, Willie Thomas; and Plaintiff avers as a proximate consequence thereof that Plaintiff's car was bent and broken, that the right fender was damaged, the grill was damaged and demolished, the right head light and parking lights were broken and demolished, the right bumper guard and fender shield were damaged and destroyed, the hood and right door were damaged, together with other and additional damages to the Plaintiff's automobile, constituting damages to the said automobile of said Plaintiff, and the said Plaintiff was deprived of the use of said automobile for a period of thirty (30) days; Plaintiff avers that all of his damages were proximately caused by the negligence of the Defendant by the negligent operation of the said automobile truck, which the Defendant was then and there driving, all to the Plaintiff's damage in the amount of Three Hundred (\$300.00) Dollars hence this suit.

FILED

Nov. 24, 1954

ALICE J. DUCK, Clerk

[Signature]
Attorney for the Plaintiff.

PLEAS

WILLIE THOMAS

PLAINTIFF

VS

EDDIE GOODLET

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW
CASE NO. 2452

Comes now the Defendant in the above styled cause and for answer to the Plaintiff's complaint says:

1.

The Defendant is not guilty.

2.

That the Plaintiff was guilty of negligence which contributed proximately to the damages complained of in the complaint, in that, at the time and place alleged in the complaint, the Plaintiff drove around a blind curve on a narrow dirt road without giving any warning signal of his approach and as a consequence of his said negligence the Plaintiff's automobile was damaged.

3.

The Plaintiff was guilty of negligence which contributed proximately to the damages complained of in the complaint, in that, at the time and place alleged in the complaint the Plaintiff drove around a blind curve on a narrow dirt road on the wrong side of the said road; and as a consequence of his said negligence the Plaintiff's automobile was damaged.

4.

The Plaintiff was guilty of negligence which contributed proximately to the damages complained of in the complaint, in that, at the time and place alleged in the complaint the Plaintiff drove around a blind curve on a narrow dirt road at an excessive rate of speed; as a consequence of his said negligence the Plaintiff's automobile was damaged.

Walters & Brantley

By Albert M Brantley
Attorneys for the Defendant

The Defendant demands a trial by jury.

FILED

Nov. 29, 1955

ALICE J. BUCK, Clerk

Walters & Brantley

By Albert M Brantley
Attorneys for the Defendant

JURY LIST

Spring Term, March 14, 1955

Willie Shornes
V S
Eddie Goodlett

NO. NAME OCCUPATION ADDRESS

- ~~1 Thomas V. Abercrombie, Jr., butcher, Robertsdale~~ 34
- 2 Lavigne Berglin, creamery, Fairhope
- 3 J. Carlisle Childress, merchant, Foley
- ~~4 J. J. Junkiewicz, merchant, Summerdale~~
- ~~5 Joseph L. Lucassen, auto dealer, Foley~~ 125
- ~~6 Irving Kasper, merchant, Fairhope~~
- ~~7 Vernon Wheat, reserve fleet, Bay Minette~~
- ~~8 Lardie L. Langham, Newport, Bay Minette~~
- ~~9 Jesse Stewart, laborer, Robertsdale~~ 25
- 10 Roger Barnhill, farmer, Loxley
- ~~11 Robert L. Teem, farmer, Foley~~ 122
- ~~12 Bernard Laurendine, laborer, Foley~~
- ~~13 Edward McDaniel, farmer, Robertsdale~~ 22
- ~~14 Robert E. Hinton, carpenter, Foley~~
- ~~15 David Golden, merchant, Foley~~ 25
- ~~16 Edward W. Engel, farmer, Summerdale~~
- ~~17 Joseph Kral, farmer, Robertsdale~~ 21
- ~~18 Grover McBride, mechanic, Foley~~ 26
- ~~19 E. L. Soesbe, mechanic, Foley~~ 24
- ~~20 Carl Slaughter, farmer, Tensasaw~~
- ~~21 Brad Neimier, merchant, Fairhope~~ 26
- 22 Robert T. Cowles, laborer, Fairhope
- 23 Marshall N. Harris, farmer, Foley
- ~~24 Charles C. Hand, Jr., real estate, Bay Minette~~
- 25 Quitman Cooper, veteran, Bon Secour
- 26 John A. Ebert, clerk, Foley
- 27 Elmer G. Anderson, contractor, Fairhope
- 28 Max Griffin, oil distributor, Foley
- 29 George Hertel, farmer, Elberta
- 30 John E. Flowers, farmer, Bon Secour
- ~~31 Frank Knowles, electrician, Bay Minette~~
- ~~32 J. Hilary Brown, cobbler, Bay Minette~~ 27
- ~~33 Martin Simmons, surveyor, Bay Minette~~
- 34 Herman Tau, butane work, Foley
- ~~35 Elroy McKenzie, Sr., farmer, Fairhope~~ 23
- ~~36 William Gullledge, farmer, Robertsdale~~ 21
- ~~37 Aaron C. Weaver, merchant, Bay Minette~~
- 38 Arthur Stenzil, furniture, Fairhope

39
24
13

TP VIIIIX II
44. IIIIX X