

S U M M O N S

STATE OF ALABAMA)
) TO ANY SHERIFF OF THE STATE OF ALABAMA:
BALDWIN COUNTY)

You are hereby commanded to summon SIDNEY MCGREW, JR. 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 JOHN PETURIS.

Witness my hand this 22 day of March 1955.

Deice J. Wrench

C O M P L A I N T

JOHN PETURIS,
 Plaintiff

vs.

SIDNEY MCGREW, JR.,
 Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

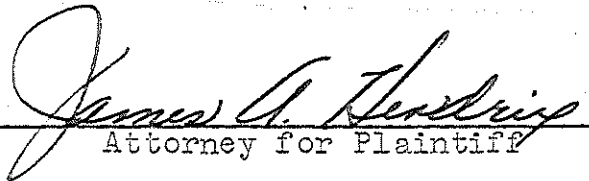
AT LAW

NO. 2574

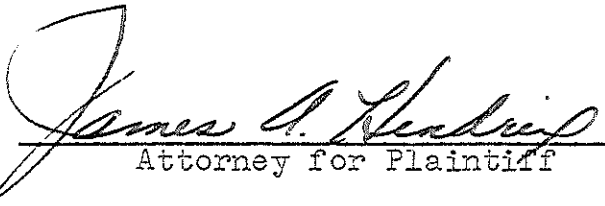
C O U N T O N E

Plaintiff claims of the Defendant the sum of FIVE HUNDRED DOLLARS (\$500.00) as damages for that heretofore on, to-wit: June 13, 1954, the Plaintiff was driving his 1951 Chevrolet automobile upon U. S. Highway No. 90, a public highway in Baldwin County, Alabama, at a point about two and one-half miles West of Old Spanish Fort where said highway crosses the Apalachee River, where he had a right to be, and then and there the Defendant so negligently operated his automobile which he was then and there driving, that by reason thereof and as a proximate result and consequence thereof, the said two vehicles collided, causing great damages and injuries to the Plaintiff's automobile; trunk lid was damaged and broken, the grille was broken and bent, the lights were broken, the bumper guards were broken, the fenders were broken and bent, the frame was badly bent, the muffler and exhaust pipe were ruined, the rear lower body panel was ruined, all to the damage of the Plaintiff as aforesaid.

And Plaintiff avers that all his damages aforesaid were proximately caused by the negligence of the Defendant, in that he negligently caused, allowed or permitted his said automobile to run upon, over or against the automobile of the Plaintiff; wherefore he sues.


Attorney for Plaintiff

Plaintiff respectfully requests that this cause be tried by a jury.


Attorney for Plaintiff

JOHN PETURIS,
Plaintiff

vs.

SIDNEY McCREW, JR.,
Defendant

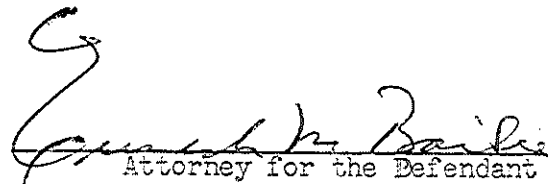
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Case No. _____

ANSWER TO BILL OF COMPLAINT

Comes now the Defendant in the above entitled cause, and for answer to the complaint, and separately and severally each count thereof says:

1. That the Defendant is not guilty as charged in the complaint.
2. For further answer to the complaint, and separately and severally each count thereof, Defendant says that at the time of the alleged collision and at the place set out in the complaint, and immediately prior to the alleged collision by the Plaintiff and the Defendant and while they were traveling along a public highway at a point mentioned in the complaint, the Plaintiff was guilty of negligence which directly or proximately contributed to the collision and to the damages complained of.


Attorney for the Defendant