

2623

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 Floyd H. Fletcher and Lloyd F. Fletcher 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 Norman Gerald.

Witness my hand this 28 day of May, 1955.

Reice J. Smith
Clerk.

NORMAN GERALD,

Plaintiff,

vs.

FLOYD H. FLETCHER and
LLOYD F. FLETCHER,

Defendants.

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

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Three Hundred Dollars (\$300.00) as damages for that on, heretofore, to-wit: May 30, 1954, the Defendant, Floyd H. Fletcher, who was then and there acting by and through his agent, servant or employee, the Defendant, Lloyd F. Fletcher, who was then and there acting within the line and scope of his employment as such, so negligently operated a motor vehicle on U. S. Highway #90, a public highway in Baldwin County, Alabama, at or on the Appalachee River Bridge so as to cause or allow his motor vehicle to collide with the rear end of the motor vehicle of the Plaintiff and as a proximate consequence

and result of the negligence of the Defendants, aforesaid, the Plaintiff was greatly damaged in that the rear end thereof was badly bent, broken and demolished, all to the damage of the Plaintiff, as aforesaid, hence this suit.

CHASON & STONE

By: 
Attorneys for Plaintiff.

1075

Received in Sheriff's Office
this 22 day of Aug, 1955
TAYLOR WILKINS, Sheriff

RECEIVED IN OFFICE

AUG 23 1955

M. S. BUTLER, Sheriff

EXECUTED BY SERVING 8
COPY OF THE WITHIN

Mary J Hunt
Deputy of State

Aug 23 1955

M S Butler
Sheriff Montgomery County
By Thomson
Deputy Sheriff

RECORDED
NO 2020

SUMMONS AND COMPLAINT

NORMAN GERALD,

Plaintiff,

vs.

FLOYD H. FLETCHER and
LLOYD F. FLETCHER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

Filed 5-28-55
Avery Jenkins

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA