

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Lois Elouise Smith 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 Edward R. Frederick.

WITNESS my hand and seal on this the 12th day of Aug 1955.

Clifford J. Smith
Clerk.

Defendant's address is Rt. 1, Foley, Alabama.

* * * * *

EDWARD R. FREDERICK,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
LOIS ELOUISE SMITH,)	AT LAW
Defendant.)	

COUNT ONE

Plaintiff claims of the Defendant the sum of Five Hundred Dollars for that on, to-wit, September 20, 1954, the Plaintiff was driving his automobile in a northerly direction along Alabama Highway No. 3 at a point approximately three miles North of Foley, Alabama, and when Plaintiff's automobile was approaching the point where the Summerdale road intersects said Alabama Highway No. 3, which said Summerdale road is a wide road leading into said Alabama Highway No. 3, the Defendant negligently drove or operated an automobile out of said Summerdale road into or upon said Alabama Highway No 3 without stopping before entering upon said highway and as a proximate result of said negligence Defendant's automobile struck or collided with Plaintiff's automobile and greatly damaged the same, in this, the right front door and right rear door were bent and damaged, the rear bumper face bar was broken, bent and smashed, the windshield was broken, the

the roof panel was bent, the front end of the automobile was damaged and paint was scratched on the entire right side of the said automobile all to the Plaintiff's damages as aforesaid. And Plaintiff avers that there was at said time and place a stop sign on the said Summerdale road at the point of its intersection with Alabama Highway No. 3.


Attorney for Plaintiff

Received 1 day of Aug 1955
and on _____ day of _____ 19____
served a copy of the within _____
on _____

y service on _____

TAYLOR WILKINS, Sheriff
By _____ D. S.

Returned 8 day of Aug 1955
Not found in my county after diligent search and in-
quiry,

Taylor Wilkins, Sheriff
By Address
Deputy Sheriff

3069
SUMMONS AND COMPLAINT *2686*

EDWARD R. FREDERICK,
Plaintiff,
VS.
LOIS ELOUISE SMITH,
Defendant.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JAMES R. OWEN
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

Filed 8-1-55
Alice J. Leuck
clerk