

EVAN A. STANTON,
Plaintiff,
VS.

MARONE McCURDY,
Plaintiff.

IN THE
CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA. AT LAW.
No. 2788

Comes now the Plaintiff in the above styled cause, by his Attorneys, and this being the day heretofore set for the hearing of this cause, and the defendant having failed to plead, answer or demur to the complaint within the time required by law, moves this Honorable Court to enter a judgment by default in favor of the Plaintiff and against the defendant, and to assess the damages to which the plaintiff is entitled upon hearing the evidence.

Respectfully submitted,

CHASON & STONE

BY: Marlene P. Stone
Attorneys for the Plaintiff

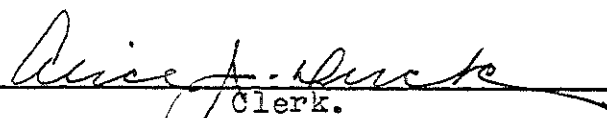
STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Marone McCurdy 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 Evan A. Stanton.

Witness my hand this 6th day of December, 1955.


Clerk.

EVAN A. STANTON,
Plaintiff,

vs.

MARONE McCURDY,
Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant the sum of One Thousand Dollars (\$1,000.00) for that on, heretofore, to-wit; January 28, 1955, the Defendant so negligently operated his automobile at the intersection of a dirt road and the Greenwood road, public roads in Baldwin County, Alabama, near Daphne, Alabama, so as to cause the same to run into, upon and against the automobile of the Plaintiff which was then and there being operated by D. C. Hawthorne 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 glass was broken, the fenders were bent and broken, the bumper was broken, the steering wheel was bent and broken, the radiator was damaged and the Plaintiff was caused to incur a wrecker bill and his automobile was otherwise damaged, wherefore the Plaintiff

brings this suit and asks judgment in the above amount.

CHASON & STONE

By: Malone S. Stone
Attorneys for Plaintiff.