

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LILLIE L. MCDILL 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 LEROY PHILLIPS.

Witness my hand, this the 16 day of Feb, 1956.

Alice J. Neely
CLERK

LEROY PHILLIPS,
 PLAINTIFF,

VS

LILLIE L. MCDILL
 DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NUMBER: 2854

1. The Plaintiff claims of Defendant the sum of One-thousand Dollars (\$1,000.00) for that on to-wit, August 27, 1955 the Defendant so negligently operated a motor vehicle on the U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said motor vehicle to run into, over or against the automobile of the Plaintiff which said automobile of the Plaintiff was then and there being operated in a lawful and proper manner on said highway, and as a proximate result of such negligence the Plaintiff's automobile was badly bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged, the rear deck panel and frame were bent, broken or damaged, hence this suit.

2. The Plaintiff claims of Defendant the sum of One-thousand Dollars (\$1,000.00) as damages for that on to-wit, August 27, 1955 she so negligently allowed or permitted one John Doe, whose name is otherwise unknown to

Plaintiff, and will be corrected by ammendment when ascertained, to operate a motor vehicle belonging to the Defendant well knowing that the said John Doe was a minor under the age of sixteen years, or that the said John Doe was intoxicated at that time and place, or was otherwise incapable or incompetent to operate such a motor vehicle, and that the said John Doe did so negligently operate such motor vehicle or operate such motor vehicle in such an incompetent, negligent or reckless manner on U.S. Highway 31 at a point approximately three and one/half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said vehicle of Defendant to run into, over or against the automobile belonging to the Plaintiff which was then and there being operated in a lawful and proper manner, and as a proximate result of her negligent acts the Plaintiff's automobile was bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged, the rear deck panel and frame were bent, broken or damaged, hence this suit.

3. The Plaintiff claims of Defendant the sum of One-thousand Dollars (\$1,000.00) for that on to-wit, August 27, 1955 the Defendant so wantonly operated a motor vehicle on the U.S. Highway 31 at a point approximately three and one/half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said motor vehicle to run into, over or against the automobile of the Plaintiff which said automobile of the Plaintiff was then and there being operated in a lawful and proper manner on said highway, and as a proximate result of such wantonness the Plaintiff's automobile was badly bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged, the rear deck panel and frame were bent, broken or damaged, hence this suit.

4. The Plaintiff claims of Defendant the sum of One-thousand Dollars (\$1,000.00) as damages for that on to-wit, August 27, 1955 she so wantonly allowed or permitted one John Doe, whose name is otherwise unknown to plaintiff, and will be corrected by ammendment when ascertained, to operate a motor vehicle belonging to the Defendant well knowing that the said John Doe was a minor under the age of sixteen years, or that the said John Doe was intoxicated at that time and place, or was otherwise incapable or incompetent to operate such a motor vehicle, and that the said John Doe did so wantonly operate such motor vehicle or operate such motor vehicle in such

an incompetent, wanton or reckless manner on U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as the automobile belonging to the Plaintiff which was then and there being operated in a lawful and proper manner, and as a proximate result of her wanton acts the Plaintiff's automobile was bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged, the rear deck panel and frame were bent, broken or damaged, hence this suit.

Wil Hays
Attorney for Plaintiff

RECORDED

2854

Received 16 day of Feb 1956
and on 16 day of Feb 1956
served a copy of the within DOC.
Lillie L. McDill
service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbot D. S.

Red Top 6 miles

Sheriff claims 6 miles at

Ten Cents per mile Total \$ 60¢

TAYLOR WILKINS, Sheriff

BY Talbot
DEPUTY SHERIFF

LEORY PHILLIPS,
PLAINTIFF,

VS

LILLIE L. MCDILL
DEFENDANT

Next can be reached
at Red Top, Mobile Hwy.

FILED

FEB 16 1956

ALICE J. DUCK, Register

COUNTY OF BALDWIN

You are hereby commanded to summon LILLIE L. McDILL AND W.M. McDILL 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 LEROY PHILLIPS.

Witness my hand, this the 10th day of July, 1956

Alice J. Duck
CLERK

NUMBER: 285-4

NUMBER: 2854

1. The Plaintiff claims of Defendant the sum of One-thousand Dollars (\$1,000.00) for that on to-wit, August 27, 1955 the Defendant so negligently operated a motor vehicle on the U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said motor vehicle to run into, over or against the automobile of the Plaintiff which said automobile of the Plaintiff was then and there being operated in a lawful and proper manner on said highway, and as a proximate result of such negligence the Plaintiff's automobile was badly bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged,


the rear deck panel and frame were bent, broken or damaged, hence this suit.

2. The Plaintiff claims of Defendants the sum of One-thousand Dollars (\$1,000.00) as damages for that on to-wit, August 27, 1955 she so negligently allowed or permitted one Albert Lee Martin to operate a motor vehicle belonging to the Defendants well knowing that the said Albert Lee Martin was a minor under the age of sixteen years, or that the said Albert Lee Martin was intoxicated at that time and place, or was otherwise incapable or incompetent to operate such a motor vehicle, and that the said Albert Lee Martin did so negligently operate such motor vehicle or operate such motor vehicle in such an incompetent, negligent or reckless manner on U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said vehicle of Defendants to run into, over or against the automobile belonging to the Plaintiff which was then and there being operated in a lawful and proper manner, and as a proximate result of her negligent acts the Plaintiff's automobile was bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged, the rear deck panel and frame were bent, broken or damaged, hence this suit.

3. The Plaintiff claims of Defendants the sum of One-thousand Dollars (\$1,000.00) for that on to-wit, August 27, 1955 the Defendants so wantonly operated a motor vehicle on the U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said motor vehicle to run into, over or against the automobile of the Plaintiff which said automobile of the Plaintiff was then and there being operated in a lawful and proper manner on said highway, and as a proximate result of such wantonness the Plaintiff's automobile was badly bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged, the rear deck panel and frame were bent, broken or damaged, hence this suit.

4. The Plaintiff claims of Defendants the sum of One-thousand Dollars (\$1,000.00) as damages for that on to-wit, August 27, 1955 she so wantonly allowed or permitted one Albert Lee Martin, to operate a motor vehicle belonging to the Defendants well knowing that the said Albert Lee Martin was a minor under the age of sixteen years, or that the said Albert Lee Martin was intoxicated at that time and place, or was otherwise incapable or incompetent to

operate such a motor vehicle, and that the said Albert Lee Martin did so wantonly operate such motor vehicle or operate such motor vehicle in such an incompetent, wanton or reckless manner on U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as the automobile belonging to the Plaintiff which was then and there being operated in a lawful and proper manner, and as a proximate result of her wanton acts the Plaintiff's automobile was bent, broken or damaged, in that the rear bumper was bent, broken or damaged, the left rear fender was bent, broken or damaged, the gasoline tank was bent, broken or damaged, the rear deck panel and frame were bent, broken or damaged, hence this suit.


Attorney for Plaintiff

RECORDED

LEROY PHILLIPS,
Plaintiff,

VS

LILLIE L. McDILL and W.M.
McDILL
Defendants

AT LAW

NUMBER: 2857

SUMMONS and AMENDED
COMPLAINT

FILED

JUL 10 1956

ALICE J. DUCK

Received 10 day of July 1956
and on 11 day of July 1956
served a copy of the within
on Lillie L McDill
W.M. McDill
By service on _____

TAYLOR WILKINS, Sheriff
By W.A. Tolbert D
Red Top

Sheriff claims 12 miles at
Ten Cents per mile Total \$ 1.20
TAYLOR WILKINS, Sheriff
BY Tolbert
DEPUTY SHERIFF