

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. F. Bevis, Sr., and James Frank Bevis, 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 Willis E. Goram.

WITNESS my hand this 2 day of March, 1956.

Alice J. Dush
Clerk.

Defendants' addresses are 428 Haralson Avenue, Gadsden, Alabama.

* * * * *

WILLIS E. GORAM,

Plaintiff,

VS.

J. F. BEVIS, SR., and JAMES
FRANK BEVIS, JR.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

COUNT ONE


The Plaintiff claims of the Defendants the sum of Five Hundred Dollars as damages for that heretofore on, to-wit: October 28, 1955, Plaintiff was operating his automobile along and upon a public highway in the County of Baldwin, State of Alabama, on, to-wit: United States Highway 31, at a point 9.1 miles North of the Courthouse square in Bay Minette, Alabama, where he had a right to be, and while said automobile was being operated and driven along said United States Highway No. 31 an automobile which was being driven by the Defendant, James Frank Bevis, Jr., who was then and there an agent, servant or employee of J. F. Bevis, Sr., and who was acting within the line and scope of his authority as such agent, servant or employee, ran upon, over or against the automobile of the Plaintiff, causing great damages and injuries to Plaintiff's

automobile; the front axle, the front bumper, the frame, the engine block and other parts of Plaintiff's automobile were broken, bent, smashed or otherwise damaged and injured, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the Defendant, James Frank Bevis, Jr., who was then and there the agent, servant or employee of the Defendant, J. F. Bevis, Sr., and who was then and there acting within the line and scope of his authority as such agent, servant or employee, in that the said James Frank Bevis, Jr., negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the Plaintiff and as a proximate consequence thereof, the Plaintiff's automobile was damaged as aforesaid.

COUNT TWO

The Plaintiff claims of the Defendants the sum of Twenty-five Hundred Dollars (\$2500) as damages for that heretofore on, to-wit: October 28, 1955, the Plaintiff's automobile was being operated along and upon a public highway in Baldwin County, Alabama, on, to-wit: United States Highway No. 31, at a point 9.1 miles North of the Courthouse square in Bay Minette, Alabama, where he had a right to be, and while said automobile was being operated and driven along said United States Highway No. 31 an automobile which was being driven by the Defendant, James Frank Bevis, Jr., who was then and there an agent, servant or employee of the Defendant, J. F. Bevis, Sr., and who was acting within the line and scope of his authority as such agent, servant or employee, run upon, over or against the automobile of the Plaintiff, and as a proximate consequence thereof Plaintiff was injured and damaged as follows: His head was lacerated, his left knee was badly bruised, his nervous system was greatly shocked and impaired, he was made sick and sore for a long period of time, his physical stamina was impaired and permanently impaired and he was caused to suffer great physical pain and mental anguish and was put to much trouble, annoyance, inconvenience, and loss of time in and about an effort to heal and cure his said wounds and injuries. Plaintiff avers

that the Defendant, James Frank Bevis, Jr., who was then and there the agent, servant or employee of J. F. Bevis, Sr., acting within the line and scope of his authority as such agent, servant or employee, negligently caused or allowed said automobile to run upon or against the automobile of the Plaintiff and that all of Plaintiff's injuries were the proximate consequence of said negligence.


Attorney for Plaintiff.

Plaintiff demands a trial by jury.


Attorney for Plaintiff.

Received in Sheriff's Office
this 2 day of Mar, 1956
TAYLOR WILKINS, Sheriff

Executed this the 9 day of Mar

1956 by serving a copy of the within on

J. F. Bevis, Sr., James

Frank Bevis, Jr.

JESS W. OWENS
Sheriff, Etowah Co., Ala.

By ZCW D. S.

SUMMONS AND COMPLAINT

Jury 2870 Orig

WILLIS E. GORAM,

Plaintiff,

VS.

J. F. BEVIS, SR., and JAMES
FRANK BEVIS, JR.,

Defendants.

428 Haroldson
RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Filed
3-2-56
clerk D. Duck, clerk
or

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA