

2953

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. 0

You are hereby commanded to summon WILLIE B. NANCE 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 JOE M. MONTGOMERY.

Witness my hand this 20 day of June, 1956.

Reid J. Duck
CLERK.

JOE M. MONTGOMERY,	0	
	0	
Plaintiff,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
WILLIE B. NANCE,	0	AT LAW. NO. _____
	0	
Defendant.	0	

C O U N T O N E

The plaintiff claims of the defendant the sum of Three Hundred and Seventy-five (\$375.00) Dollars as damages for that heretofore on, to-wit: the 16th day of April, 1956, at about 6:30 o'clock, A. M., the plaintiff was driving his automobile South on Old Daphne Road, a City Street in the City of Bay Minette, Alabama, at a point where it is intersected by Mingo Street, where he had a right to be, and the defendant so negligently operated an automobile which she was then and there driving as to cause the plaintiff's automobile which he was then and there driving as aforesaid to be thrown off or to skid off said road and to collide with a telephone post on the side of said road; and plaintiff avers that as a proximate consequence the automobile being operated by the plaintiff was badly bent, broken, smashed and damaged: the top, front axle, left front fender, left front tire, bumper, left front door, left panel, steering gear, glass, windshield and left rear fender and panel, 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; and plaintiff avers that all of his said damages were proximately caused by the negligence of the defendant, in that she negligently caused, allowed or permitted the automobile which she was then and there driving to force the automobile of the plaintiff off the road as aforesaid; hence this suit.

C O U N T T W O

The plaintiff claims of the defendant the sum of Three Hundred and Seventy-five (\$375.00) Dollars as damages for that, heretofore, on, to-wit: the 16th day of April, 1956, at about 6:30 o'clock, A. M., the defendant so negligently operated an automobile on the Old Daphne Road, a public street in the City of Bay Minette, Alabama, at a point where said Street is intersected by Mingo Street, as to force an automobile which the plaintiff was then and there driving off of said street and to cause it to collide with a telephone post on the shoulder of said street; and plaintiff avers that as a proximate consequence of the negligence of the defendant as aforesaid plaintiff's automobile was badly bent, broken and damaged; the front axle, left front fender, left front tire, bumper, left front door, left front panel, left panel, steering gear, glass, windshield, left rear fender and panel, 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; and plaintiff avers that all of his said damages were proximately caused by the negligence of the defendant, in that she negligently caused, allowed, or permitted the automobile which she was then and there driving to force the automobile of the plaintiff off the road as aforesaid; hence this suit.

Julius A. Maslowski, Jr.
ATTORNEY FOR PLAINTIFF.

Plaintiff respectfully requests that this cause be tried by a jury.

Julius A. Maslowski, Jr.
ATTORNEY FOR PLAINTIFF.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW, NO. 2953

RECORDED

JOE M. MONTGOMERY,
Plaintiff,
VS.
WILLIE B. NANCE,
Defendant.

SUMMONS AND COMPLAINT.

FILED
JUN 20 1956

~~TELFORD~~ ^{1. Duck, Clerk} MASHBURN, JR.
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

DEFENDANT RESIDES IN
BAY MINETTE.

Received 20 day of June 1956
nd on 21 day of June 1956
served a copy of the within 89C
n Willie B Nance

By service on _____

TAYLOR WILKINS, Sheriff
By W.A. Folbert D. S.
O-miller

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