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Defendants live at
Route 1, Theodore, Alabama

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VS.

COUNT ONE

The Plaintiff claims of the Defendants the sum of Ten Thousand (\$10,000.00) Dollars as damages for that heretofore, to-wit, on the 9th day of October, 1955, Plaintiff's automobile was lawfully being driven along a public highway in Baldwin County, Alabama on U. S. Highway # 98 (formerly # 89) and then and there the Defendant, Herman L. Clemmons, a minor, while acting within the line and scope of his authority as agent, servant or employee of the Defendant, Lester P. Clemmons, negligently ran an automobile into, upon or against the Plaintiff's automobile and as a proximate consequence whereof inflicted personal injuries upon the Plaintiff in this: his head was contused,

RAY D. BRIDGES, Special Agent
Not found in my County after 48 hrs.
without cause for such delay.

his face was bruised and cut, he received numerous lacerations on his face and body, his eye was injured, he was permanently injured; he was forced to incur considerable expenses for medical treatment, hospital services, nurses' hire, and for the purchase of medicines and drugs in and about the treatment of his said injuries; he lost much time from his work, he was rendered permanently less able to work; and further his automobile was damaged, the frame, chassis and body was broken, bent and bruised; all to his damages as aforesaid, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendants the sum of Ten Thousand (\$10,000.00) Dollars as damages for that heretofore, to-wit, on the 9th day of October, 1955, Plaintiff's automobile was lawfully being driven along the public highway in Baldwin County, Alabama on U. S. Highway # 98 (formerly 89) and then and there the Defendant, Herman L. Clemmons, a minor, while acting within the line and scope of his authority as agent, servant or employee of the Defendant, Lester P. Clemmons, being conscious at the time that his conduct in so doing would probably result in disaster, willfully or wantonly ran another automobile into, upon or against the automobile in which the Plaintiff was riding, and thereby and as a proximate result and consequence thereof inflicted personal injuries in this: his face was bruised, and cut, he received numerous lacerations on his face and body, his eye was injured, he was permanently injured; he was forced to incur considerable expenses for medical treatment, hospital services, nurses' hire, and for the purchase of medicines and drugs in and about the treatment of his said injuries; he lost much time from his work, he was rendered permanently less able to work; and further his automobile was damaged, the frame, chassis and body was broken, bent and bruised; all to his damages as aforesaid, hence this suit.

Solicitor for the Plaintiff

E. M. Bailey - Solicitor

STATE OF ALABAMA

BALDWIN COUNTY

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HERMAN L. CLEMMONS and LESTER P. CLEMMONS to appear and answer, plead or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against them in the Circuit Court, at Law, for said County of said State, by ISADORE B. REYNOLDS.

Herein fail not. Due return make of this writ as the law directs.

Witness my hand this 8th day of October, 1956.

Wesley J. Hensley
Clerk of Court

Defendants live at
Route 1, Theodore, Alabama

ISADORE B. REYNOLDS,
Plaintiff

vs.

HERMAN L. CLEMMONS and
LESTER P. CLEMMONS,
Defendants

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The Plaintiff claims of the Defendants the sum of Ten Thousand (\$10,000.00) Dollars as damages for that heretofore, to-wit, on the 9th day of October, 1955, Plaintiff's automobile was lawfully being driven along a public highway in Baldwin County, Alabama on U. S. Highway # 98 (formerly # 89) and then and there the Defendant, Herman L. Clemmons, a minor, while acting within the line and scope of his authority as agent, servant or employee of the Defendant, Lester P. Clemmons, negligently ran an automobile into, upon or against the Plaintiff's automobile and as a proximate consequence whereof inflicted personal injuries upon the Plaintiff in this: his head was contused,

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his face was bruised and cut, he received numerous lacerations on his face and body, his eye was injured, he was permanently injured; he was forced to incur considerable expenses for medical treatment, hospital services, nurses' hire, and for the purchase of medicines and drugs in and about the treatment of his said injuries; he lost much time from his work, he was rendered permanently less able to work; and further his automobile was damaged, the frame, chassis and body was broken, bent and bruised; all to his damages as aforesaid, hence this suit.

COUNT TWO

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The Plaintiff claims of the Defendants the sum of Ten Thousand (\$10,000.00) Dollars as damages for that heretofore, to-wit, on the 9th day of October, 1955, Plaintiff's automobile was lawfully being driven along the public highway in Baldwin County, Alabama on U. S. Highway # 98 (formerly 89) and then and there the Defendant, Herman L. Clemmons, a minor, while acting within the line and scope of his authority as agent, servant or employee of the Defendant, Lester P. Clemmons, being conscious at the time that his conduct in so doing would probably result in disaster, willfully or wantonly ran another automobile into, upon or against the automobile in which the Plaintiff was riding, and thereby and as a proximate result and consequence thereof inflicted personal injuries in this: his face was bruised, and cut, he received numerous lacerations on his face and body, his eye was injured, he was permanently injured; he was forced to incur considerable expenses for medical treatment, hospital services, nurses' hire, and for the purchase of medicines and drugs in and about the treatment of his said injuries; he lost much time from his work, he was rendered permanently less able to work; and further his automobile was damaged, the frame, chassis and body was broken, bent and bruised; all to his damages as aforesaid, hence this suit.

James M. Babin
Solicitor for the Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

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I

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HERMAN L. CLEMMONS and LESTER P. CLEMMONS to appear and answer, plead or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against them in the Circuit Court, at Law, for said County of said State, by ISADORE B. REYNOLDS.

Herein fail not. Due return make of this writ as the law directs.

Witness my hand this 8 day of October, 1956.

Wesley J. Smith
Clerk of Court

Defendants live at
Route 1, Theodore, Alabama

ISADORE B. REYNOLDS,

Plaintiff

vs.

HERMAN L. CLEMMONS and
LESTER P. CLEMMONS,

Defendants

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The Plaintiff claims of the Defendants the sum of Ten Thousand (\$10,000.00) Dollars as damages for that heretofore, to-wit, on the 9th day of October, 1955, Plaintiff's automobile was lawfully being driven along a public highway in Baldwin County, Alabama on U. S. Highway # 98 (formerly # 89) and then and there the Defendant, Herman L. Clemmons, a minor, while acting within the line and scope of his authority as agent, servant or employee of the Defendant, Lester P. Clemmons, negligently ran an automobile into, upon or against the Plaintiff's automobile and as a proximate consequence whereof inflicted personal injuries upon the Plaintiff in this: his head was contused.

ed 7 day of Oct 1956
ed a copy of the within ~~Herman L. Clemmons~~
~~BY BVC.~~
Herman L. Clemmons
Lester P. Clemmons

CO 154 3053 343

TAYLOR WILKINS, Sheriff
By D. S.

BILL OF COMPLAINT

Returned day of 19
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

By Deputy Sheriff

ISODORE B. REYNOLDS,
Plaintiff

vs.

✓ HERMAN L. CLEMMONS and
✓ LESTER P. CLEMMONS,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
OCT 18 1956
JAMES A. DUCK, Clerk

ERNEST M. BAILEY
ATTORNEY AT LAW
FAIRHOPE, ALABAMA