

3074

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Abe Hall, 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 Doyle Quinn.

WITNESS my hand this 27 day of October, 1956.

Deane J. Leach
Clerk of the Circuit Court of Baldwin
County, Alabama.

Defendant's address is:
206 Chestang Street
Mobile, Alabama

C O M P L A I N T

DOYLE QUINN,

Plaintiff,

vs.

ABE HALL,

Defendant.

! * ! * ! * ! * ! * !

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

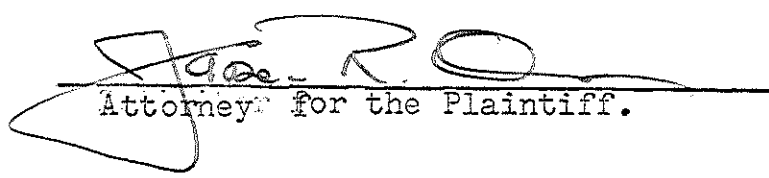
COUNT ONE:

The Plaintiff claims of the Defendant the sum of Twenty Thousand Dollars (\$20,000.00) for that heretofore on to-wit, June 24, 1956, the Plaintiff was operating his automobile upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway #31, at a point approximately two miles South of Bay Minette, Alabama, where he had a right to be, and while said automobile was being operated and driven by the Plaintiff along said highway in a North-erly direction and at a point directly West of a place of business known as the "Red Top", an automobile which was being driven by the Defendant ran upon, over or against the automobile of the Plaintiff, causing great damages and injuries to the Plaintiff, to-wit, his chest was severely injured, his ribs were bruised and broken, his left hip was broken and he suffered internal injuries, was made sick and sore; his body was greatly bruised and injured,

he was permanently injured, and has suffered, and is suffering, mental pain and anguish, all to the Plaintiff's damages aforesaid. The Plaintiff alleges that his said injuries were proximately caused by the negligence of the Defendant, in that he 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 was injured as aforesaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Fifteen Hundred Dollars (\$1500.00) for that heretofore on, to-wit, June 24, 1956, the Plaintiff was operating his automobile upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway #31, at a point approximately two miles South of Bay Minette, Alabama, where he had a right to be, and while said automobile was being operated and driven by the Plaintiff along said highway in a North-erly direction, and at a point directly West of a place of business known as the "Red Top", an automobile which was being driven by the Defendant run upon, over or against the automobile of the Plaintiff causing great damages and injuries to the Plaintiff's automobile to-wit, the top, front axel, front grill, frame and other parts of Plaintiff's automobile was smashed and otherwise damaged so as to render the automobile of no value to the Plaintiff. The Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the Defendant in that he 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.


Attorney for the Plaintiff.

EXECUTED
This 27 day of Oct, 1956
by serving a copy of the within on

Abe Hall
RAY D. BRIDGES, Sheriff
By H. C. Sanders D.S.

The Sheriff claims 10
miles at 10¢ per mile =
a total of \$ 1.00
Ray Bridges, Sheriff
Mobile County, Alabama

Ma 3074
RECORDED
SUMMONS AND COMPLAINT

DOYLE QUINN,
Plaintiff,

vs.
ABE HALL, 292 Ind 9
Defendant.

206 Chestang St.

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

FILED
OCT 27 1956
ALICE J. DUCK, Clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA