

3075

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 Glenda Quinn, by Doyle Quinn as her next friend.

WITNESS my hand this 27 day of October, 1956.

*Alvin J. Duck*  
Clerk of the Circuit Court of  
Baldwin County, Alabama.

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

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C O M P L A I N T

GLEND A QUINN,  
By Doyle Quinn, as her  
next friend,

Plaintiff,

vs.

ABE HALL,

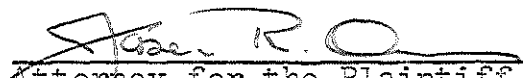
Defendant.

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

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Ten Thousand Dollars (\$10,000.00) for that heretofore on to-wit, June 24, 1956, the Defendant negligently drove an automobile into an automobile in which the Plaintiff was riding, in Baldwin County, Alabama, on U. S. Highway #31, at a point approximately two miles South of Bay Minette, Alabama, and directly West of a place of business known as the "Red Top", and as a proximate result of said negligence on the part of the Defendant, the Plaintiff was seriously and permanently injured, and caused to suffer great pain, she was injured and permanently injured, her right leg was broken and she suffered internal injuries; was made sick and sore; her body was greatly bruised and injured and she has suffered, and is suffering, mental pain and anguish, all to the Plaintiff's damages

as aforesaid.

  
Attorney for the Plaintiff.

COPIED RECORDED NO. 3075

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SUMMONS AND COMPLAINT

EXECUTED  
This 29 day of Feb, 1956  
by serving a copy of the within on  
Abe Hall  
RAY D. BRIDGES, Sheriff  
By H. A. Bridges D.S.

GLEND A QUINN,  
By Doyle Quinn, as her  
next friend,

Plaintiff,

vs.

ABE HALL, 27 land 10

Defendant.

206 Chestang St.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

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

FILED  
OCT 27 1956  
ALICE J. DUCK, Clerk

JAMES R. OWEN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA