

Received 50 day of April 1957
and on 7 day of May 1957
I served a copy of this within s/c
on Connie Knight.

By service on _____

TAYLOR WILKINS, Sheriff
By William Stidham D. S.
Larley

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY Stidham
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.
NO. 3225

ETHEL TAYLOR,
Plaintiff,
vs.
CONNIE KNIGHT,
Defendant.

Defendant resides at
Lafayette, Ala
SUMMONS AND COMPLAINT.

FILED
APR 30 1957

ALICE J. DUCK, Register
JAMES A. HENDRIX
ATTORNEY AT LAW
ROBERTSDALE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons CONNIE KNIGHT 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 ETHEL TAYLOR.

Witness my hand this the 30 day of April, 1957.


Clerk

ETHEL TAYLOR,

Plaintiff,

vs.

CONNIE KNIGHT,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AP. LAW.
No. 3325

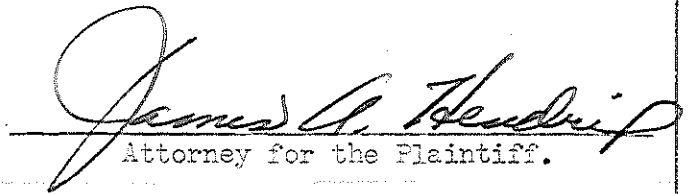
COUNT 1.

The Plaintiff claims of the Defendant, the sum of FIVE HUNDRED (\$500.00) Dollars as damages for that on, to-wit: August 11, 1956, the Plaintiff's automobile was being operated along and upon a public highway in Baldwin County, Alabama, to-wit: the Campbell Farm to Market Road, at a point about one mile North-east of the Town of Loxley, Alabama, and that then and there the Defendant negligently drove an automobile into or against the automobile belonging to the Plaintiff, causing great damages and injuries to the Plaintiff's automobile: the right rear fender was bent and broken, the rear bumper was broken and smashed, the right rear wheel was bent and the right rear tire was punctured and smashed, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that her said damages to her said automobile were proximately caused by the negligence of the Defendant, in that he negligently caused, allowed or permitted said automobile to run into or against the automobile of the Plaintiff and as a proximate consequence thereof the Plaintiff's automobile was damaged and injured as aforesaid, hence this suit.

COUNT 2.

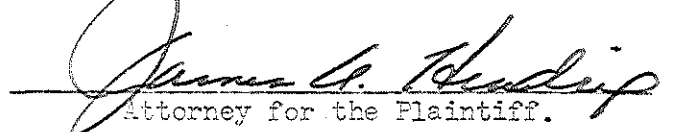
The Plaintiff claims of the Defendant, the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that on, to-wit: August 11, 1956, at approximately 7:30

P.M., A. V. Campbell was driving an automobile belonging to the Plaintiff along and upon a public highway in Baldwin County, Alabama, to-wit, the Campbell Farm to Market Road, at a point about one mile Northeast of the Town of Loxley, Alabama; and that then and there the defendant negligently drove an automobile into or against the automobile belonging to the Plaintiff, causing great damages and injuries to the Plaintiff's automobile: the right rear fender was bent and broken, the rear bumper was broken and smashed, the right rear wheel was bent and the right rear tire was punctured and smashed, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that her said damages to her said automobile were proximately caused by the negligence of the Defendant, in that he negligently caused, allowed or permitted said automobile to run into or against the automobile of the Plaintiff and as a proximate consequence thereof the Plaintiff's automobile was damaged and injured as aforesaid, hence this suit.


Attorney for the Plaintiff.

The Plaintiff respectfully demands a trial by Jury.

Filed Apr. 30, 1957
Alice J. Luck, Clerk
Executed May 3, 1957


Attorney for the Plaintiff.