

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. ....

October TERM, 1957.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Terry Campbell

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against Terry Campbell

\_\_\_\_\_, Defendant .....

by Frederick S. McGee

\_\_\_\_\_, Plaintiff.....

Witness my hand this 18 day of October 1957.


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Deice J. Luck, Clerk

FREDERICK S. McGEE,  
Plaintiff  
vs.  
TERRY CAMPBELL,  
Defendant

IN THE CIRCUIT COURT OF  
  
BALDWIN COUNTY, ALABAMA  
  
IN LAW. NO. \_\_\_\_\_.

The plaintiff claims of the defendant the sum of \$214.83 as damages for that heretofore and on, to-wit: June 8, 1957, on U.S. Highway #90 at a point thereon, to-wit: 4 miles west of Robertsedale, Alabama, which said highway at said point is a public highway in Baldwin County, Alabama, the plaintiff was operating his automobile and at the same time and at the same place, the defendant so negligently operated the vehicle which he was driving so as to cause or allow the same to collide with a third vehicle, knocking the same into automobile which the plaintiff was driving, and as a direct and proximate cause of the negligence of the defendant as aforesaid, the motor vehicle of the plaintiff, a 1954 Oldsmobile 4-door, was badly broken, torn and damaged in this that among other things, the rear bumper was bent up into the trunk lid, bumper guard split, trunk lid bent and sprung, left rear fender and skirt buckled, and left rear door jammed shut, hence this suit.

*Filed Oct. 18, 1957*  
*Executed Nov. 14, 1957*  
  
Attorney for Plaintiff

BALDWIN COUNTY, ALABAMA

IN LAW. NO. 3352.

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FREDERICK S. MCGEE,

PLAINTIFF

VS.

TERRY CAMPBELL,

DEFENDANT

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SUMMONS AND COMPLAINT

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EXECUTED

This 16 day of Nov., 1957

by serving a copy of the within on

Terry Campbell

RAY D. CAMPBELL, Sheriff

By W. Davis D.S.

FILED

OCT 18 1957

AUGUST 1, 1957, Clerk

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

101 Court House Square

BAY MINETTE, ALABAMA

Defendant lives 1759 Navco Road,  
Mobile, Alabama

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