

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. 0

You are hereby commanded to summon JOHN W. WILKINSON and A. T. LONG, JR., doing business as LONG EXTERMINATING COMPANY, 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 FELTON J. ROBERTS, JR., a Minor, who sues by his Father and next friend, FELTON J. ROBERTS.

Witness my hand this 23 day of November, 1957.

David L. Hulse
C L E R K

FELTON J. ROBERTS, JR., A
Minor, who sues by his
Father and Next Friend,
Felton J. Roberts,

Plaintiff,

VS.

JOHN W. WILKINSON and A. T.
LONG, Jr. doing business as
LONG EXTERMINATING COMPANY,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO.

3404

C O U N T O N E.

The plaintiff claims of the defendants the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages, for that, heretofore, on, to-wit: Monday, the 9th day of September, 1957, at about 3:15 o'clock, P. M., on U. S. Highway Number 31, a public highway, in Baldwin County, Alabama, at a point about 1.8 miles South of the City Limits of Bay Minette, Alabama, and about 150 feet South of Culver's Nursery, the defendant, JOHN W. WILKINSON, who was then and there an agent, servant, or employee of the defendant, A. T. LONG, JR., d/b/a LONG EXTERMINATING COMPANY, acting within the line and scope of his employment as such, so negligently operated an automobile truck, belonging to the defendant, A. T. LONG, JR., d/b/a LONG EXTERMINATING COMPANY, which he was then and there driving, as to cause the same to run into, over or against an automobile which plaintiff was then and there driving, and by reason thereof and as a proximate consequence and result thereof plaintiff received severe personal injuries, in this, to-wit: He was made sick, sore,

lame and disordered; he was bruised and lacerated about the head, face, arms, body and legs; he suffered numerous contusions and abrasions all over his body; he was permanently injured; his forehead was permanently scarred and injured; he suffered, and continues to suffer, great mental anguish and physical pain; he was caused to suffer loss of time from his work; and he was caused to expend large sums of money for Doctors, hospital care, nursing, and medicines in and about the care and treatment of his injuries; for all of which he claims damages as aforesaid.

And plaintiff avers that he received said injuries as aforesaid as the proximate result and consequence of the negligence of the defendant, JOHN W. WILKINSON, driving an automobile truck belonging to the defendant, A. T. LONG, JR., d/b/a LONG EXTERMINATING COMPANY, and acting within the line and scope of his authority as an agent, servant or employee of the said A. T. LONG, JR., at the time and place herein complained of; hence this suit.

J. Hain A. Maschbury, Jr.
ATTORNEY FOR PLAINTIFF.

Plaintiff respectfully requests that this cause be tried by a jury.

J. Hain A. Maschbury, Jr.
ATTORNEY FOR PLAINTIFF.

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BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 3404

FELTON J. ROBERTS, JR., A
Minor, who sues by his
Father and Next Friend,
FELTON J. ROBERTS,

Plaintiff,

VS.

JOHN W. WILKINSON and A.
T. LONG, JR., doing busi-
ness as LONG EXTERMINATING
COMPANY,

FILED Defendants.
NOV 23 1957
SUMMONS AND COMPLAINT.

ALICE L. DUCK, Clerk

TELFAIR J. MASHBURN, JR.

ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

John W. Wilkinson
2041 Elvis Dr.
Mobile, Alabama

A. T. Long, Jr.
521 N. Combe Ave.

EXECUTED
This 28 day of Nov., 19 57
by serving a copy of the within on
John W. Wilkinson
RAY D. BRIDGES, Sheriff
By _____ D.S.

EXECUTED
This 28 day of Nov., 19 57
by serving a copy of the within on
A. T. Long Jr.
RAY D. BRIDGES, Sheriff
By H. Davis D.S.