

JOHN HEMMERT, JR.,

Plaintiff,

VS.

CLARENCE EVANS,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO.

3436

The plaintiff claims of the defendant the sum of ONE HUNDRED AND SEVENTY-FIVE (\$175.00) DOLLARS, AS damages, for that, heretofore, on, to-wit: Sunday afternoon, the 25th day of August, 1957, at about 4:30 o'clock, P. M., at or about the intersection of U. S. Highway Number 98 and the Josephine Road, Public Highways in Baldwin County, Alabama, the defendant so negligently operated an automotive vehicle which he was then and there driving as to cause the same to run into, upon or against an automobile belonging to the plaintiff and as a proximate result and consequence thereof plaintiff's automobile was badly bent, broken and damaged; the frame was bent, broken and damaged; he was deprived of the use of his said automobile, which he used in and about his business, for a long period of time; and he was caused to expend large sums of money in and about the repair of his said automobile; and plaintiff avers that all of his said damages were caused by the negligent operation, by the defendant, of his automotive vehicle at the time and place complained of; hence this suit.

J. H. A. Marshall
ATTORNEY FOR PLAINTIFF

Plaintiff requests that this cause be tried by a jury.

J. H. A. Marshall
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 3436

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Clarence Evans

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

Clarence Evans

, Defendant

by John Hemmert, Jr.

, Plaintiff

Witness my hand this

2nd

day of

Jan

1958

Deirdre J. Smith

Clerk