

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ERNEST T. BROOKS 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 Eldred A. Quade.

Witness my hand, this the 9 day of May, 1958.

Alice J. Duck
CLERK

ELDRED A. QUADE

Plaintiff

VS

ERNEST T. BROOKS

Defendant

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 3537

I

Plaintiff claims of Defendant the sum of ONE-THOUSAND (\$1000.00) DOLLARS damages for that on to-wit the 4th day of August, 1957 the Defendant so negligently operated a motor vehicle on U. S. Highway 31 at a point approximately six (6) miles north of the eastern city limits of Bay Minette, Alabama on U. S. Highway 31 in Baldwin County, Alabama as to allow it to run into, over or against the automobile of the Plaintiff which automobile Plaintiff was then and there operating on the said U. S. Highway 31 in a lawful and proper manner, and as a proximate result of the said negligence of the Defendant, the Plaintiff's automobile was damaged, the right front grill, radiator, right front door, right front head lamp and right rear door and fender were bent, broken and damaged hence this suit.

II

Plaintiff claims of Defendant the sum of ONE-THOUSAND (\$1000.00) DOLLARS damages, for that on, to-wit, August 4, 1957, Defendant so willfully and wantonly operated a motor vehicle on U. S. Highway 31 in Baldwin County, Alabama approximately six (6) miles North of the Eastern city limits of Bay Minette, Alabama, on U. S. Highway 31, and to allow it to run into, over or against the automobile of the Plaintiff, which automobile Plaintiff was

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ELDRED A. QUADE
Plaintiff

VS

ERNEST T. BROOKS
Defendant

) IN THE CIRCUIT COURT
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) BALDWIN COUNTY, ALABAMA
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) AT LAW
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) NUMBER: 3537
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I

Plaintiff claims of Defendant the sum of ONE-THOUSAND (\$1000.00) DOLLARS damages for that on to-wit the 4th day of August, 1957 the Defendant so negligently operated a motor vehicle on U. S. Highway 31 at a point approximately six (6) miles north of the eastern city limits of Bay Minette, Alabama on U. S. Highway 31 in Baldwin County, Alabama as to allow it to run into, over or against the automobile of the Plaintiff which automobile Plaintiff was then and there operating on the said U. S. Highway 31 in a lawful and proper manner, and as a proximate result of the said negligence of the Defendant, the Plaintiff's automobile was damaged, the right front grill, radiator, right front door, right front head lamp and right rear door and fender were bent, broken and damaged hence this suit.

II

Plaintiff claims of Defendant the sum of ONE-THOUSAND (\$1000.00) DOLLARS damages, for that on, to-wit, August 4, 1957, Defendant so willfully and wantonly operated a motor vehicle on U. S. Highway 31 in Baldwin County, Alabama approximately six (6) miles North of the Eastern city limits of Bay Minette, Alabama, on U. S. Highway 31, and to allow it to run into, over or against the automobile of the Plaintiff, which automobile Plaintiff was

then and there operating on the said U. S. Highway 31 in a lawful and proper manner, and as a proximate result of the said willful and wanton operation of the Defendant Plaintiff's automobile was damaged in this: The right front grill, radiator, right front door, right front head lamp and right rear door and fender were bent, broken and damaged hence this suit.

W. L. Harper
Attorney for Plaintiff

*Defendant may be
served at Harper
Bentley company*