

JOSEPH D. NAUGHTON,

Plaintiff

vs.

WILLIAM R. THOMPSON,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO.

3566

The plaintiff claims of the defendant the sum of FOUR HUNDRED AND NO/100(\$400.00)DOLLARS as damages for that heretofore and on, to-wit: September 9, 1957, on U. S. Highway #90 at a point thereon, to-wit: at a point 4.4 miles East of the City Limits of Mobile, Alabama, which said highway at said point is a public highway in Baldwin County, Alabama, the defendant so negligently operated his motor vehicle so as to cause or allow the same to run into, upon or against the motor vehicle of the plaintiff which the plaintiff was operating at the same time and at the same place. As a direct and proximate consequence of the negligence of the defendant aforesaid, the motor vehicle of the plaintiff, a 1955 Ford, was badly broken, torn and damaged in this that among other things, the rear bumper was broken, the trunk was smashed, the gas tank was bent and torn, and the rear panel of the car was bent. Hence this suit.

James Owens Jr.
Attorney for Plaintiff

Plaintiff demands a trial by jury.

James Owens Jr.

Executed
June 10, 1958
Alice J. Luck
clerk

Received 5 day of June 1958
and on 10 day of June 1958
served a copy of the within S.C.
on William R Thompson
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Roberts, Jr.
omi

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3566

JOSEPH D. NAUGHTON,
Plaintiff

vs.

WILLIAM R. THOMPSON,
Defendant

SUMMONS AND COMPLAINT

FILED

JUN 5 1958

ALICE J. DUCK, Clerk

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

101 Court House Square

BAY MINETTE, ALABAMA

*Defendant lives at Bay
Minette, Ala.*

JOSEPH D. NAUGHTON
PLAINTIFF
VS
WILLIAM R. THOMPSON
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW
NO. 3566

Comes now the Defendant in the above styled cause and for answer to the Complaint heretofore filed against him says:

1.

Not guilty.

2.

The Defendant alleges that at the time and place alleged in the Plaintiff's Complaint the Plaintiff was himself guilty of negligence which proximately contributed to his alleged injuries in that he so negligently operated his automobile as to cause or allow the same to run into, upon or against the automobile of the Defendant, hence the Plaintiff should not recover.

3.

For further answer to the Complaint, the Defendant says; that at the time of the commencement of this suit the Plaintiff was indebted to the Defendant in the sum of EIGHT HUNDRED (\$800.00) DOLLARS as damages for that on to-wit, the 9th day of September, 1957, the Defendant's automobile was being operated along U. S. Highway No. 90 at a point 4.4 miles East of the city limits of Mobile, Alabama, said highway at said point is a public highway in the County of Baldwin, State of Alabama, and that then and there the Plaintiff so negligently operated his automobile as to cause or allow it to run into or hit the automobile of the Defendant and as a direct, proximate, consequence and result thereof the Defendant's automobile was badly bent, damaged and broken, all to the loss of the Defendant in the aforesaid amount.

FILED

JUN 20 1958

ALICE J. DUCK, CLERK
REGISTER

Wilgers & Brantley

BY: Robert M. Brantley
Attorneys for the Defendant

JOSEPH D. NAUGHTON,

Plaintiff

vs.

WILLIAM R. THOMPSON,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

No. 3566

Comes now the Plaintiff in the above styled cause and for answer to the Plea of Recoupment heretofore filed against him says:

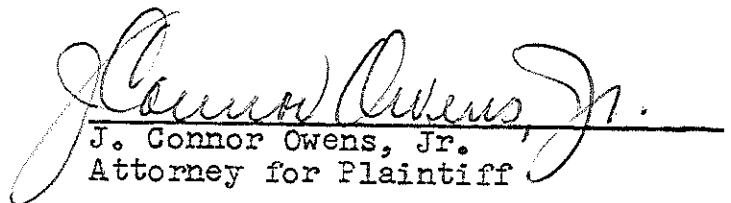
1. Not guilty.

2. The Plaintiff alleges that at the time and place alleged in the Defendant's Plea of Recoupment the Defendant was himself guilty of negligence which proximately contributed to his alleged injuries in that he so negligently operated his automobile as to cause or allow the same to run into, upon or against the automobile of the Plaintiff, hence the Defendant should not recover.

FILED

JUL 23 1958

ALICE J. DUCK, CLERK
REGISTER


J. Connor Owens, Jr.
Attorney for Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3566

JOSEPH D. NAUGHTON,
Plaintiff

vs.

WILLIAM R. THOMPSON,
Defendant

PLAINTIFF'S ANSWER TO DEFEN-
DANT'S PLEA OF RECOUPMENT

FILED
JUL 23 1958
ALICE L. DUCK, Clerk

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 Court House Square
BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 3566

June TERM, 1958

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William R. Thompson

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 _____

William R. Thompson, Defendant

by Joseph D. Naughton

Plaintiff.....

Witness my hand this 5th day of June 1958.

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Alice J. Black, Clerk