

3760

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon T. T. Wallace 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 Herbert J. Potts.

Witness my hand this the 5 day of January, 1959.

Richard L. Smith
Clerk

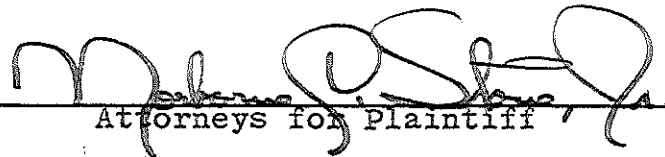
HERBERT J. POTTS,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	
	I	BALDWIN COUNTY, ALABAMA
T. T. WALLACE,	I	
Defendant.	I	AT LAW
	I	

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) as damages for that on, heretofore, to-wit: the 13th day of June, 1958, the Defendant so negligently operated a motor vehicle along U. S. Highway 31, in Bay Minette, Alabama, a public road in Baldwin County, Alabama, at a point thereon approximately one-half mile North of its intersection with the Hurricane Road, as to cause or allow said motor vehicle to run into, upon and against a motor vehicle of the Plaintiff and as a proximate consequence and result of the negligence of the Defendant, aforesaid, Plaintiff's automobile was greatly damaged in this: the front end thereof was bent and broken, both fenders were bent and broken, the hood was bent and broken, the engine was damaged, the frame was bent, the right side-rail was bent and broken, the steering wheel was bent and broken and the automobile of the Plaintiff was otherwise greatly damaged; all to

his damage, aforesaid, wherefore he brings this suit and asks judgment in the above amount.

CHASON & STONE

By: 
Attorneys for Plaintiff

10, 3161

HERBERT J. POTTS,

Plaintiff,

VS.

T. T. WALLACE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED
FEB 16 1959
ALICE I. DUCK, CLERK
REGISTER

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

Received 5 day of Feb 1958
and on 13 day of Feb 1958
I served a copy of the within REC
on T. T. Wallace

By service on T. Wallace

TAYLOR WILKINS, Sheriff
By W. A. Gilbert D. S.
Cross Road

Sheriff claims 14 miles 55
Ten Cents per mile Total \$ 1.40
TAYLOR WILKINS, Sheriff
BY Robert
DEPUTY SHERIFF

HERBERT J. POTTS
PLAINTIFF

VS

T. T. WALLACE,
DEFENDANT

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA.
* AT LAW
* CASE NO. _____
*
*

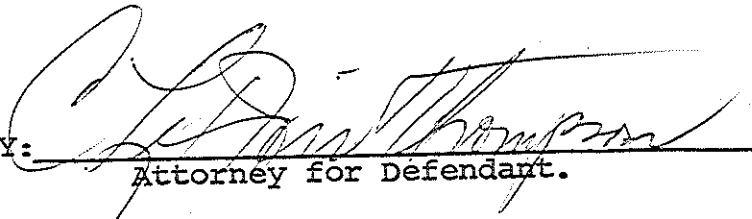
Comes the defendant in the above styled cause and for answer to said count thereof and to each phase of said count thereof separately and severally shows unto this Honorable Court as follows:

COUNT ONE

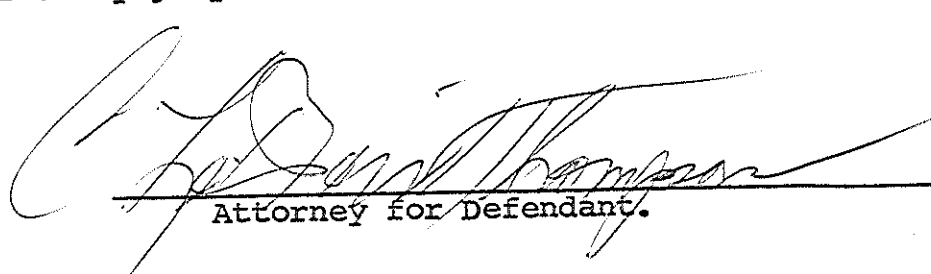
Not guilty.

THOMPSON & WHITE

BY:


Attorney for Defendant.

Defendant demands trial by jury.


Attorney for Defendant.

June

3761

HERBERT J. POTTS
PLAINTIFF

VS

T. T. WALLACE
DEFENDANT

FILED

MAR 9 1959

ALICE J. DUCK, CLERK
REGISTER

Defendant's counsel first by mail.

APPROVED FOR DEPOSITOR