

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ERNEST CECIL SLYE 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 filed against him by THOMAS B. CALHOUN, JR., a minor, suing by his mother and next friend, JEAN L. CALHOUN.

WITNESS my hand this 2nd day of March, 1959.

The defendant resides at  
Fairhope in Baldwin  
County, Alabama.

*Reed J. Hurd*  
Clerk of the Circuit Court

*Ex. 3-9-59*

\* \* \* \* \*

THOMAS B. CALHOUN, JR., )  
a minor, suing by his mother )  
and next friend, JEAN L. )  
CALHOUN, )  
Plaintiff, )  
VS. )  
ERNEST CECIL SLYE, )  
Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 3780

#### COMPLAINT

The plaintiff claims of the defendant Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit, March 2, 1958, at the intersection of Magnolia Avenue and Church Street, public streets or highways in Fairhope, Baldwin County, Alabama, the defendant so negligently operated the motor vehicle which he was then and there driving as to cause it to run into, upon or against a motor scooter on which the plaintiff was then and there riding as a passenger, and as a proximate consequence and result of the said negligence of the said defendant the plaintiff sustained multiple lacerations of the forehead, elbows and forearm, his left arm was broken, his nervous system was shocked and impaired

and he was caused to suffer great physical pain and mental anguish  
and was also caused to expend large amounts for the treatment of  
his said injuries.

J. B. Blackburn  
Attorney for plaintiff

Plaintiff demands a trial of said cause by jury.

J. B. Blackburn  
Attorney for plaintiff

3780

SUMMONS AND COMPLAINT

THOMAS B. CALHOUN, JR., a minor,  
suing by his mother and next  
friend, JEAN L. CALHOUN,

Plaintiff,

VS.

ERNEST CECIL SLYE,

Defendant.

*1 motion*

Received 3 day of March 1950  
on 9 day of March 1950  
I received a copy of the within Ernest Cecil Slye  
service on Ernest Cecil Slye

TAYLOR WILKINS, Sheriff

By [Signature] D. S.

Sheriff claims 70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 3780

*July*

FILED

MAR 21 1950

ALICE J. DUCK, CLERK  
REGISTER