

SUMMONS AND COMPLAINT

STATE OF ALABAMA        §

BALDWIN COUNTY        §

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ALKON WARREN to appear within thirty days from the service of this Writ in the Circuit Court to be held in said County at the place of holding the same, then and there to answer the complaint of HARMON BROWN.

Witness my hand this 25 day of April, 1959.

Deice J. Newick  
Clerk

HARMON BROWN,

Plaintiff,

Vs.

ALKON WARREN,

Defendant.

§

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§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that heretofore on to-wit: February 19, 1959, Plaintiff was riding along or upon the Brady Road, a public highway, in the City of Bay Minette, Baldwin County, Alabama, at or near a point where the same intersects Old Daphne Road, at said time and place Alkon Warren, so negligently operated his automobile that it ran into or upon the vehicle in which the Plaintiff was riding, as a direct result and proximate consequence of said negligence the Plaintiff was injured; his left eye was bruised and torn, the left side of his body was crushed, mashed and bruised. The Plaintiff was caused to expend sums of

money to cure and treat his injuries. The Plaintiff was caused to lose time from work, that aforesaid injuries were temporary and permanent in nature.

Hence this suit.

WITLERS & BRANTLEY

By:

Albert M Brantley

Defendant

WITKON MASON

as

Plaintiff

WITKON MASON

COMPLAINT

4/6/22

FILED  
APR 11 1922  
RECEIVED  
CLERK

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STATE OF ALABAMA            §

BALDWIN COUNTY 8

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Witness my hand this 25 day of April, 1959.

Clerk

N.F.

HARMON BROWN,

Plaintiff,

**Vs.**

ALCON WARREN,

Defendant.

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AT LAW.

COUNT ONE:

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Hence this suit.

WITLERS & BRANTLEY

By: Robert M Brantley

no. 3821

COMPLAINT

HARMON BROWN,

Plaintiff,

VS

ALIKON WARREN,

Defendent

*Jay Wilson Chet.*

Received 25 day of April 1959

and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

I served a copy of the within B. W.

on Alkon Warren

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_ D. \_\_\_\_\_

Returned 21 day of May 1959

Not found in my county after diligent search and  
inquiry.

Taylor Wilkins, Sheriff

By W. A. Zolbert

Deputy Sheriff

FILED

APR 25 1959

ALICE J. DUCK, CLERK  
REGISTER