

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No.

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. B. PLATESBURG

3999

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 J. B. PLATESBURG

_____, Defendant

by THOMAS B. REED

_____, Plaintiff.....

Witness my hand this 3 day of OCT 1959

Exp 10-21-59 Dee J. Duck Clerk

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

THOMAS B. REED

Plaintiffs

vs.

J. B. PLATESBURG

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this, 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

C O M P L A I N T

THOMAS B. REED,) IN THE CIECUIT COURT OF
PLAINTIFF,)
VS.) BALDWIN COUNTY, ALABAMA
J. B. PLATESBURG,) AT LAW.
DEFENDANT.)


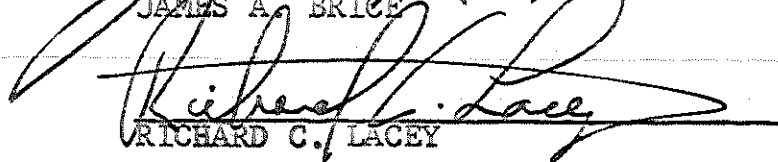
COUNT ONE

Plaintiff claims of the Defendant the sum of Three Thousand and No/100 (\$3,000.00) Dollars as damages for that heretofore, on, to-wit: the 4th day of August, 1959, the Defendant, J.B.Platesburg, so negligently operated a motor vehicle Westwardly on West Laurel Avenue at the intersection of West Laurel Avenue and South Beech Street in the Town of Foley, Baldwin County, Alabama, so as to cause or allow said vehicle to collide with Plaintiff's motor vehicle which was being operated in a Westwardly direction on said Avenue by the Plaintiff where he had a lawful right to be, and as a direct and proximate result of the negligence of the Defendant, J.B.Platesburg, the Plaintiff was seriously injured, was made sick and sore, was caused to suffer great pain and mental anguish; the Plaintiff received sprains of the neck which has caused and still causes, at the time of the filing of this suit, a stiffness and soreness of the neck. Plaintiff was caused to incur expenses of doctors, nurses, X-rays, and drugs in and about the treatment of his said injuries as aforesaid, and will likely incur additional expenses of like nature in the future; and Plaintiff's motor vehicle was greatly damaged; for all of which he claims damages as aforesaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of Three Thousand and No/100 (\$3,000.00) Dollars as damages for that heretofore, on, to-wit: the 4th day of August, 1959, the defendant, J.B. Platesburg, so wantonly operated a motor vehicle Westwardly on West Laurel Avenue at the intersection of West Laurel Avenue and South Beech

Street in the Town of Foley, Baldwin County, Alabama, so as to cause or allow said vehicle to collide with Plaintiff's motor vehicle which was being operated in a Westwardly direction on said Avenue by the Plaintiff where he had a lawful right to be, and as a direct and proximate result of the wantonness of the Defendant, J. B. Platesburg, the Plaintiff was seriously injured, was made sick and sore, was caused to suffer great pain and mental anguish; the Plaintiff received sprains of the neck which has caused and still causes, at the time of the filing of this suit, a stiffness and soreness of the neck. Plaintiff was caused to incur expenses of doctors, nurses, X-rays, and drugs in and about the treatment of his said injuries as aforesaid, and will likely incur additional expenses of like nature in the future; and Plaintiff's motor vehicle was greatly damaged; for all of which he claims damages as aforesaid.


JAMES A. BRICE

RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

Plaintiff demands trial by Jury.


OF COUNSEL

Received 3 day of Oct 1954
and on 21 day of Oct 1954
served a copy of the within Doc
on J. B. Platesburg
by service on _____

TAYLOR WILKINS, Sheriff
W. D. ...
Foley

Sheriff claims 72 miles of
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY CC
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

THOMAS B. REED,

PLAINTIFF,

VS.

J. B. PLATESBURG,

DEFENDANT.

FILED
OCT 3 1954
ALICE J. DUCK, CLERK
REGISTER

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA