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STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Charles Hudson Raines, Clarence Miller, Goff Jenkins and Miller & Jenkins, Inc., a corporation, 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 George W. McKinley.

Witness my hand this 3 day of October, 1958.

Archie Muck
Clerk

GEORGE W. MCKINLEY,
Plaintiff,

vs.

CHARLES HUDSON RAINES,
CLARENCE MILLER, GOFF
JENKINS and MILLER &
JENKINS, INC., A CORPORATION,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

COUNT ONE:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that, on, to-wit: November 28, 1958, the Defendants, at a point about six (6) miles East of Mobile, Alabama, on U. S. Highway 90, in Baldwin County, Alabama, negligently drove a motor vehicle into, upon or against an automobile owned by the Plaintiff and which he was then and there driving along such highway and as a proximate result of the negligence of such Defendants the automobile owned by the Plaintiff was damaged in this: its body was bent and damaged; its front and rear bumpers were badly bent; its front and rear fenders were bent; the windshield was broken; the trunk was smashed; the tail lamp was broken; the frame was bent; its grille was bent and the Plaintiff avers that the negligence of such Defendants was the proximate cause of the Plaintiff's

damages, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that, to-wit: November 28, 1958, the Defendants Clarence Miller, Goff Jerkins and Miller & Jerkins, Inc., a corporation, acting by and through Charles Hudson Baines, as their agent, servant or employee, who was then and there acting within the line and scope of his employment as such, negligently drove a motor vehicle into, upon or against an automobile owned by the Plaintiff and which was then and there being driven by him along such highway and as a proximate result of the negligence of such Defendants the automobile owned by the Plaintiff was damaged in this: its body was bent and damaged; its front and rear bumpers were badly bent; its front and rear fenders were bent; the windshield was broken; the trunk was smashed; the tail lamp was broken; the frame was bent; its grille was bent and the Plaintiff avers that the negligence of such Defendants was the proximate cause of the Plaintiff's damages, hence this suit.

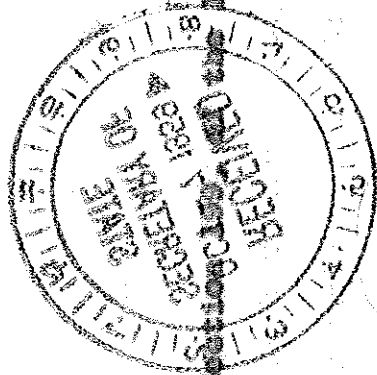

Attorneys for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Blanche White, a Notary Public, in and for said County in said State, personally appeared John Chason who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is John Chason; that he is one of the attorneys of record for the Plaintiff in the above styled cause; that the Defendant Charles Hudson Baines is a non-resident of the State of Alabama, his postoffice address being Route 3, Bonifay, Florida; that Defendants Clarence Miller and Goff Jerkins, are non-residents of the State of Alabama, their postoffice addresses being Bonifay, Florida; that Miller & Jerkins, Inc., a corporation, is a non-resident corporation and is believed to be incorporated in the State of Florida and the addresses of its officers are believed to be Bonifay, Florida. That it is necessary that service be had on such De-



Sentences in accordance with Title 7, Section 17-1-1, Code of Alabama, are awarded.

GEORGE A. WICKIERTA

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GUINNESS & COMPANY LTD.

tells the 3rd day of October, 1850.

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1. The first step is to identify the problem or goal. This involves understanding the current situation and what needs to be achieved.

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