

ROY LYNCH, : IN THE CIRCUIT COURT OF
Plaintiff, :
VS: : BALDWIN COUNTY, ALABAMA
ROBERT JAYE, :
Defendant. : AT LAW
: NO. 4030

COUNT ONE

Plaintiff claims of the Defendant the sum of THREE THOUSAND FIVE HUNDRED AND 00/100 (\$3500.00) DOLLARS, for this, that heretofore and on, to-wit, November 10, 1958, the Plaintiff's automobile was being operated on or along U. S. Highway 31, at or near a point approximately three miles East of Spanish Fort, said U. S. Highway 31 being then and there a public highway in Baldwin County, Alabama, and at the time and place aforesaid the Defendant did so negligently operate a truck so as to cause or allow the same to run into and against the automobile of the Plaintiff and as a direct and proximate result of the aforesaid negligence of the Defendant the Plaintiff's automobile was greatly bent, smashed and broken, his wife, who was the operator of the Plaintiff's automobile at the time and place aforesaid, was made sick, lame and sore and the Plaintiff was caused to spend large sums of money for medical and doctor's expenses in and about her care and cure, he was caused to lose the services and consortium of his wife for a long period of time, all to his damage in the amount aforesaid, hence this suit.

COLLINS, GALLOWAY & MURPHY

By: Wm. Galloway
ATTORNEYS FOR PLAINTIFF

Plaintiff respectfully demands a trial by Jury of this cause.

COLLINS, GALLOWAY & MURPHY

By: Wm. Galloway
ATTORNEYS FOR PLAINTIFF

Address of Defendant:
Atmore, Alabama

FILED

OCT 28 1959

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4030

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ROBERT JAYE

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-----

ROBERT JAYE-----, Defendant-----

by ROY LENCH-----

-----, Plaintiff-----

Witness my hand this 28 day of October 19 59

Edw. 10-30-59 Alfred J. Duck, Clerk

No. 4030

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The State of Alabama
Baldwin County

CIRCUIT COURT

ROY LYNCH

Plaintiffs

vs.

ROBERT JAYE

Defendants

Summons and Complaint

Filed October 28, 19 59

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19 _____

_____, Sheriff

I have executed this summons

this 30th Oct 19 59

by leaving a copy with

Robert Jaye

2

_____, Sheriff

Deputy Sheriff

Robert Jaye
D. S. [Signature]