

STATE OF ALABAMA )  
BALDWIN COUNTY )

4092

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LISTER L. THOMPSON and MRS. CORDIE THOMPSON, 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 R. D. DANLEY.

WITNESS my hand this 4 day of December, 1959.

*Reece J. Hester*  
Clerk.

Defendants' address:  
East Brewton, Alabama

*12-7-59*

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R. D. DANLEY,	0	
Plaintiff,	0	IN THE CIRCUIT COURT OF
vs.	0	BALDWIN COUNTY, ALABAMA
LISTER L. THOMPSON and	0	
MRS. CORDIE THOMPSON,	0	AT LAW.
Defendants.	0	

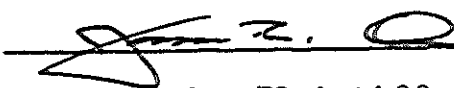
COUNT ONE:

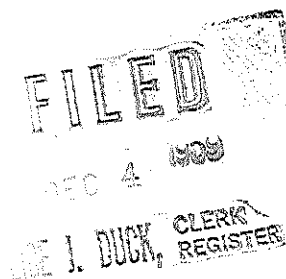
The Plaintiff claims of the Defendant, Lister L. Thompson, the sum of One Hundred Dollars (\$100.00) for that heretofore, on, to-wit, July 31, 1959, Plaintiff was operating a motor vehicle in a Northerly direction on U. S. Highway 31, at a point where a driveway leads from the West edge of the highway to Coastal Concrete Company, which point is at or near the South City Limits of Bay Minette, Baldwin County, Alabama, at which time and place the Defendant, Lister L. Thompson so negligently operated a motor vehicle as to cause it to run into, upon or against the motor vehicle of the Plaintiff, and as a proximate consequence of the negligence of said Defendant, Lister L. Thompson, Plaintiff's motor vehicle was bent, broken and damaged on the left rear and left side

thereof. Plaintiff avers that all of his damages were caused as a proximate result of the negligence of the said Defendant, Lister L. Thompson.

COUNT TWO:

The Plaintiff claims of the Defendant, Mrs. Cordie Thompson, the sum of One Hundred Dollars (\$100.00) for that heretofore, on to-wit, July 31, 1959, Plaintiff was operating a motor vehicle in a Northerly direction on U. S. Highway 31, at a point where a driveway leads from the West edge of the highway to Coastal Concrete Company, which point is at or near the South City Limits of Bay Minette, Baldwin County, Alabama, at which time and place the Defendant, Lister L. Thompson, who was then and there an agent, servant or employee of the said Defendant, Mrs. Cordie Thompson, acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle as to cause it to run into, upon or against the motor vehicle of the Plaintiff, and as a proximate consequence of the negligence of the said Defendant, Lister L. Thompson, who was then and there an agent, servant or employee of the said Defendant, Mrs. Cordie Thompson, acting within the line and scope of his authority as such agent, servant or employee, Plaintiff's motor vehicle was bent, broken and damaged on the left rear and left side thereof. Plaintiff avers that all of his damages were caused as a proximate result of the negligence of the said Defendant, Lister L. Thompson, who was then and there an agent, servant or employee of the said Defendant, Mrs. Cordie Thompson, acting within the line and scope of his authority as such agent, servant or employee.

  
Attorney for Plaintiff.



MOORE-HANDLEY HARDWARE CO., INC.,  
a Corporation,

Plaintiff,

Vs

DAVID J. JAYE, Individually and  
Doing Business as ROCK HILL SERVICE  
CENTER,

Defendant.

) IN THE CIRCUIT COURT OF  
)  
) BALDWIN COUNTY ALABAMA  
)  
) AT LAW

)  
)  
)  
) NO 11072  
)

COUNT ONE

Plaintiff claims of the defendant the sum of, to-wit, EIGHT HUNDRED FIFTEEN AND 22/100 (\$815.22) DOLLARS due from him by account between the defendant and Moore-Handley Hardware Company, Inc., a corporation, during the period September 19, 1958 to November 4, 1958, inclusive, which sum of money with the interest thereon, is still unpaid.

COUNT TWO

Plaintiff claims of the defendant the sum of, to-wit, EIGHT HUNDRED FIFTEEN AND 22/100 (\$815.22) DOLLARS on account stated between the defendant and Moore-Handley Hardware Company, Inc., a Corporation, on the 17th day of November 1959, which sum of money with the interest thereon, is still unpaid.

COUNT THREE

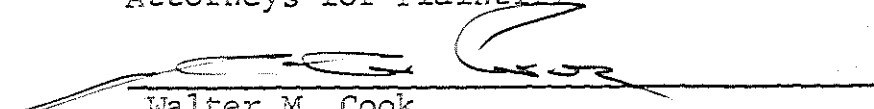
Plaintiff claims of the defendant the sum of, to-wit, EIGHT HUNDRED FIFTEEN AND 22/100 (\$815.22) DOLLARS, for merchandise, goods, and chattels sold by Moore-Handley Hardware Company, Inc., a Corporation, to the defendant during the period September 19, 1958 to November 4, 1958, inclusive, which sum of money with the interest thereon is still unpaid.

FILED

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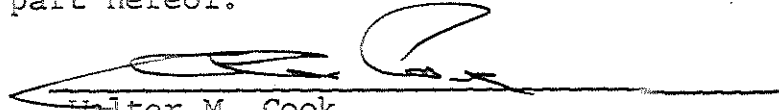
ALICE J. DUCK, CLERK  
REGISTER

LYONS, PIPES AND COOK  
Attorneys for Plaintiff

  
Walter M. Cook

An itemized verified statement of account sued upon in Counts One and Two is hereto attached and made a part hereof.

Defendant may be served:  
Bay Minette, Alabama

  
Walter M. Cook

4092

SUMMONS AND COMPLAINT

R. D. DANLEY,

Plaintiff,

vs.

LISTER L. THOMPSON AND MRS.  
CORDIE THOMPSON,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

JAMES R. OWEN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

Executed this 12-7-59 day  
Nov 1959 by serving  
a copy of the within.

Mrs. Cordie Thompson  
Lister L. Thompson

on

D. W. Byrne  
Sheriff