----TERM, 19.60

The State of Alabama, Baldwin County.	Circuit Court, Baldwin Co	u:
TO ANY SHERIFF OF THE STA	ATE OF ALABAMA:	
You Are Hereby Commanded to Sur	mmon THOMAS TATE and STELLA TAT	E

by____B.H._WOLKE

Witness my hand this_____

)		Circuit Court,	Baldwin	County
(No.4/23	_		

to appear a	nd plead, ans		r, within thirty	days from	the servic	e hereof,	to the comp	laint filed	l in
the Circuit	Court of Bale	dwin County	, State of Alaba	ıma, at Ba	y Minette,	against	THOMAS	TATE	.and
STELLA	TATE						Y	Defendan	. s

224

___day of _January_

No		Å H	*,	Defe	ndant liv	es at		
The State (Baldwin			.:	:	:			
CIRCUIT			Received In Office					
					·			19
B.H. WOLFE	· · · · · · · · · · · · · · · · · · ·	Trype Tiller Comment						, Sheriff
	Plain	itiffs/				euted this		
	vs,			this				19
THOMAS TATE	E and		ender State of State	by leavir	ig a copy	with		
			-					٠.
STELLA TATE	i Defenda	ints	•			:		
Summons ar	nd Complair	nt (·		-		
	./						:	<u> </u>
Piled	1	9	or the second se					
	(Yarl	}	***************************************	:		·	
		JIGI K		**		:		
		A discondition					***************************************	
		(A) ON case of C Village					-:	
: :		Š						
				. :				
* *		ggerman A			•			
J. Connor C	wens, Jr.	. J. Perdident Services					4.114.4	
	Plaintiff's Attor		•			# # # # = = =	w	Sheriff
N2 (:	Defendant's Attor	ney		: :			Dej	putySheriff

Įt t

n in

B.H. WOLFE,

PLAINTIFF.

VS.

THOMAS TATE AND STELLA TATE,

DEFENDANTS.

IN THE CIRCUIT COURT OF

BAIDWIN COUNTY, ALABAMA,

IN LAW

NO.

Plaintiff claims of the Defendants the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that heretofore and on to-wit: August 5, 1959, at 3:30 P.M., the Plaintiff's daughter-in-law, Louise Wolfe, was lawfully operating the motor vehicle of the Plaintiff on Greeno Road, a public road in Baldwin County, Alabama, at a point thereon $1\frac{1}{4}$ miles South of the City Limits of Fairhope, Alabama, and at the same time and at the same place, the Defendant, Thomas Tate, who was then and there acting as an agent of the Defendant, Stella Tate, while acting within the line and scope of his agency, so negligently operated a motor vehicle so as to cause or allow the same to run into, upon or against the vehicle owned by the Plaintiff, so that the Plaintiff's automobile was broken, damaged and crushed in that the left fender was bent and smashed, the left side of the car was bent in and had to be replaced and that said damages to the Plaintiff were the proximate consequence of the negligence of the Defendant, Thomas Tate, who was then and there acting as an agent of the Defendant, Stella Tate, while actin within the line and scope of said agency, as aforesaid, hence this suit.

FILED JAN 7 1960 ALKEL DUCK, CHIE

225

TAYLOR WILKINS? Sheriff By W. G. Jainel D. S. Thope

Sheriff claims 140 miles of If an Cents per mile Total 3. 44
I JAYLOD WILKINS, Sheriff
BY DEPUTY SHERIFF

IN THE CIRCUIT COURT OF BAIDWIN COUNTY, ALABAMA, NO.4/23 TN LAW

B.H. WOLFE,

PLAINTIFF,

VS.

THOMAS TATE AND STELLA TATE,

DEFENDANTS.

SUMMONS AND COMPLAINT

ALICE J. DUCK, Clerk

LAW OFFICES OF J. CONNOR OWENS, JR. 101 COURTHOUSE SQUARE BAY MINETTE, ALABAMA

7. Defendents 191

The State of Alabama,	Circuit Court, Baldwin County
Daidwin County.	JANUARY TERM, 1960
TO ANY SHERIFF OF THE STA	TE OF ALABAMA:
You Are Hereby Commanded to Su	nmonTHOMAS TATE and STELLA TATE
r ·	
•	r, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County	State of Alabama, at Bay Minette, againstTHOMAS TATE an
STELLA TATE	, Defendant S
byB.HWOLFE	
~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	Plaintiff
Witness my hand this 7 %	day of January1960_
	alice I which, Clerk

No		Page				Defend	ant lives at	
	State of A		ıa					
	CUIT C				F	eceive	d In Offic	e
CIN	COII C	CONT		1		ė		19
B.H.V	VOT. FE							1/~~
		P	laintis/s/				ted this sum	
, i	vs,		1					19
тном а з	S TATE a	nd		i i	by leaving	a copy	with	
	*	2.3.22			-			
STELLA	A TATE	Defe	endants	-				
Summo	ons and	Compl	aint				:	
}				. !	1,1900			
Filed	4	,	10	:				
rned			*/**	-	4		<u> </u>	
	: '	: 	Clerk					
	· .		:	:				
			:					
		***			**********			
		\$ 2 2						
						4		
: : :		\$ \\ \frac{1}{2}			-	-		
J. Cor	nnor Owe	na. Jr.						
	P	laintiff's A	ttorney	- :				Sherif
				-			I	Deputy Sherif
2 t = 1	De	fendant's A	ttorney					• -

B.H. WOLFE,

PLAINTIFF.

VS.

THOMAS TATE AND STELLA TATE,

DEFENDANTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW

NO._____

Plaintiff claims of the Defendants the sum of FIVE HUNDRED (\$500.00) DCLLARS as damages for that heretofore and on to-wit: August 5, 1959, at 3:30 P.M., the Plaintiff's daughter-in-law, Louise Wolfe, was lawfully operating the motor vehicle of the Plaintiff on Greeno Road, a public road in Baldwin County, Alabama, at a point thereon 12 miles South of the City Limits of Fairhope, Alabama, and at the same time and at the same place, the Defendant, Thomas Tate, who was then and there acting as an agent of the Defendant, Stella Tate, while acting within the line and scope of his agency, so negligently operated a motor vehicle so as to cause or allow the same to run into, upon or against the vehicle owned by the Plaintiff, so that the Plaintiff's automobile was broken, damaged and crushed in that the left fender was bent and smashed, the left side of the car was bent in and had to be replaced and that said damages to the Plaintiff were the proximate consequence of the negligence of the Defendant, Thomas Tate, who was then and there acting as an agent of the Defendant, Stella Tate, while acting within the line and scope of said agency, as aforesaid, hence this suit.

FILED JAN 7 1960. ALKEL DUCK, CHIENK

225

IN LAW B.H. WOLFE, VS. THOMAS TATE AND STELLA TATE, TAYLOR WILKINS? Sheriff By W. P. Jainel D. S. Sheriff claims 140 miles af

Ten Cents per mile Total \$.44

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF ALICE J. DUCK, Clerk LAW OFFICES OF BAY MINETTE, ALABAMA

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, NO.4/123 PLAINTIFF, DEFENDANTS. SUMMONS AND COMPLAINT J. CONNOR OWENS, JR. 101 COURTHOUSE SQUARE

FAIRhope, AlA.