

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4123

JANUARY TERM, 1960

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon THOMAS TATE and STELLA TATE

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 THOMAS TATE and
STELLA TATE, Defendant ^S

by B. H. WOLFE

Plaintiff

Witness my hand this 7th day of January 1960

Alice J. Luck, Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

B. H. WOLFE

Plaintiff/s

vs.

THOMAS TATE and

STELLA TATE

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

J. Connor Owens, Jr.

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

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) 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 $1\frac{1}{2}$ 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

ALICE J. DUCK, Clerk

James C. Curren, Jr.
Attorney for Plaintiff

Received 7 day of Dec 1960
and on 14 day of Jan 1960
served a copy of the within 8 cc
Thomas Tate
Stella Tate
by service on _____

TAYLOR WILKINS? Sheriff
By W. C. Garner D. S.
J. Hope

Sheriff claims 140 miles at
Ten Cents per mile Total \$ 14.00
TAYLOR WILKINS, Sheriff
By Garner
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. 4123

B. H. WOLFE,
PLAINTIFF,
VS.
THOMAS TATE AND
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DEFENDANTS.

SUMMONS AND COMPLAINT

FILED
JAN 7 1960
ALICE J. DUCK, Clerk

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

7. Defendant's mt

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_____, Deputy Sheriff

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J. Lewis Curran, Jr.
Attorney for Plaintiff

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By W. C. Garner D. S.
Fairhope

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JAN 7 1960
ALICE J. DUCK, Clerk

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

Defendants at
Fairhope, ALA.