

JAMES C. HANCOCK, JR.

Plaintiff,

vs.

JOSEPH BOSTON and LENO  
MONTGOMERY,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO.

4446

The Plaintiff claims of the Defendants the sum of \$400.00 as damages for that on heretofore, to-wit: May 8th, 1960, at about 4:55 P.M., at the intersection of Lloyd Street and United States Highway 90 West, in Crestview, Florida, the Defendant, Leno Montgomery, who was then and there acting as the agent, servant or employee of the said Defendant, Joseph Boston, while acting in the line and scope of said employment, so negligently operated a motor vehicle so as to cause or allow the same to run into, upon or against the automobile of the Plaintiff, which was then and there being operated by the Plaintiff's daughter, and as a proximate consequence and results of the negligence of ~~the Defendant, Joseph Boston, who was then and there an agent,~~ servant or employee of the Defendant, Joseph Boston, and acting within the line and scope of employment, the Plaintiff's automobile was damaged in that the right front fender, right front light, fender skirt, hood, motor, and drive rods were bent, knocked out and torn, therefore he brings this suit and asks judgment in the above amount.

*J. Cassius Owens, Jr.*  
Attorney for the Plaintiff

FILED

OCT 11 1960

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. 24446

...OCTOBER.....TERM, 1960

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon \_\_\_\_\_

JOSEPH BOSTON and LENO MONTGOMERY

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 \_\_\_\_\_

JOSEPH BOSTON and LENO MONTGOMERY....., Defendant.s--

by \_\_\_\_\_

JAMES C. HANCOCK, JR......, Plaintiff

Witness my hand this 11 day of Oct 1960

Alice J. Luck....., Clerk

Defendant, Joseph Boston, lives in Bay Minette, Alabama

Defendant, Leno Montgomery, lives at Little River, Alabama

JAMES C. HANCOCK, JR.  
Plaintiff,

vs.

JOSEPH BOSTON and LENO  
MONTGOMERY,

Defendants.

IN THE CIRCUIT COURT OF

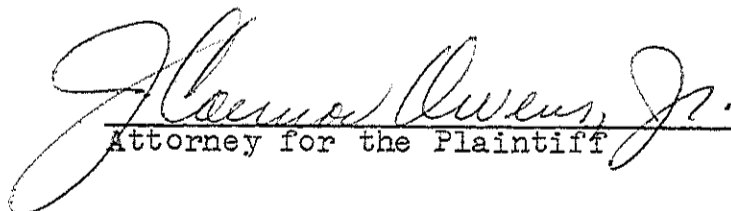
BALDWIN COUNTY, ALABAMA,

AT LAW NO. \_\_\_\_\_.

The Plaintiff claims of the Defendants the sum of \$400.00 as damages for that on heretofore, to-wit: May 8th, 1960, at about 4:55 P.M. at the intersection of Lloyd Street and United States Highway 90 West, in Crestview, Florida, the Defendant, Leno Montgomery, who was then and there acting as the agent, servant or employee of the said Defendant, Joseph Boston, while acting in the line and scope of said employment, so negligently operated a motor vehicle so as to cause or allow the same to run into, upon or against the automobile of the Plaintiff, which was then and there being operated by the Plaintiff's daughter, and as a proximate consequence and results of the negligence of the Defendant, Leno Montgomery, who was then and there an agent, servant or employee of the Defendant, Joseph Boston, and acting within the line and scope of employment, the Plaintiff's automobile was damaged in that the right front fender, right front light, fender skirt, hood, motor, and drive rods were bent, knocked out and torn, therefore he brings this suit and asks judgment in the above amount.

FILED  
OCT 11 1960

ALICE J. DUCK, Clerk

  
Attorney for the Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. ....

OCTOBER ..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon \_\_\_\_\_

JOSEPH BOSTON and LENO MONTGOMERY

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 .....

JOSEPH BOSTON and LENO MONTGOMERY ..... Defendant.s.

by .....

JAMES C. HANCOCK, JR. ...., Plaintiff.

Witness my hand this 11 day of Oct. 1960

*Alice J. Luck* ..... Clerk

Defendant, Joseph Boston, lives in Bay Minette, Alabama.

Defendant, Leno Montgomery, lives at Little River, Alabama.

Received 11 day of Oct 19 60  
on 20 day of Oct 19 60  
I have a copy of the within  
Joseph Boston  
Leno Montgomery  
services on Joseph Boston is a  
Deceased  
TAYLOR WILKINS, Sheriff  
By W. A. Talbot

Sheriff claims 70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
BY collect  
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 11116  
\*\*\*\*\*

JAMES C. HANCOCK, JR.,  
Plaintiff,  
vs.  
JOSEPH BOSTON and LENO  
MONTGOMERY,  
Defendants.  
\*\*\*\*\*

SUMMONS & COMPLAINT  
\*\*\*\*\*

FILED  
OCT 11 1960  
ALICE J. DUCK, Clerk

J. CONNOR OWENS, JR.  
ATTORNEY AT LAW  
Dahlberg Building  
BAY MINETTE, ALABAMA