

SUMMONS

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA.....GREETING:

You are hereby commanded to summons Redwing Carriers, Inc. to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of C. P. Taylor.

Witness my hand this 21 day of October, 1960.

Clerk

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COMPLAINT

C. P. Taylor,

Plaintiff

Vs:

Redwing Carriers, Incorporated

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

I

The plaintiff claims of the defendant the sum of Five Hundred and no/100 (\$500.00) Dollars as damages for that the defendant, by its agent, servant, or employee, D. Snyder, while acting within the line and scope of his employment, did so negligently operate a motor vehicle onto, on to-wit: on the 27th day of November, 1959, upon the following property, to-wit: lot 2 of Taylor's Riverview Subdivision according to the plat thereof recorded in Map Book 3, Page 76 in the Office of the Judge of Probate of Baldwin County, Alabama, said property ^{owned by plaintiff} being located in Baldwin County, Alabama, so as to cause or allow said vehicle to run upon, across and over a private roadway on said property when said private roadway had been freshly paved and was not receptive to motor vehicles, and as a direct and proximate result of the neg-

James A. R.
Attorney for Plaintiff

ALICE L. DUCK, CLERK.
REGISTER

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No. 4457

Page

Defendant lives at

THE STATE OF ALABAMA
Baldwin County

Wilson Road (Powderly)
Birmingham, Alabama

CIRCUIT COURT

C. P. Taylor, Plaintiff

vs

Redwing Carriers, Inc.
Defendant

SUMMONS AND COMPLAINT

Filed FILED 1960

OCT 21 1960

ALICE T. DUCK, CLERK
REGISTER Clerk

Wife's Address:
Place of business
Wilson Road (Powderly)
Birmingham, Ala

Plaintiff's Atty.

Riddle Defendant's Atty.

RECEIVED IN OFFICE

1960

Sheriff

I have executed this
summons this 25 - Oct 1960

by leaving a copy with

L. C. Cornington Agt.

MOLT A. McDOWELL, JR.

D. S. & F. Riddle

Sheriff

peace, etc. etc.
in rebuilding said private roadway all to plaintiff's damage;
damaged and rendered unusable; plaintiff suffered great expense
ment and plaintiff's newly paved private roadway was greatly
D. Snyder, while working within the line and scope of his employ-
ment of the defendant, by its agent, servant, or employee;

ATTORNEY FOR DEFENDANT

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

October 20, 1960

Mrs. Alicê J. Duck
Circuit Clerk
Bay Minette, Alabama

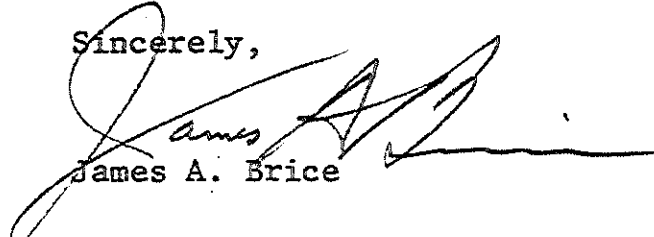
Re: C. P. Taylor
Vs: Redwing Carriers, Inc.

Dear Mrs. Duck:

I am enclosing summons and complaint for the above Plaintiff.

I suggest you have the defendant served at its place of business on Wilson Road (Powderly), Birmingham, Alabama.

Sincerely,


James A. Brice

JAB:j
Enclosure

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

December 5, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

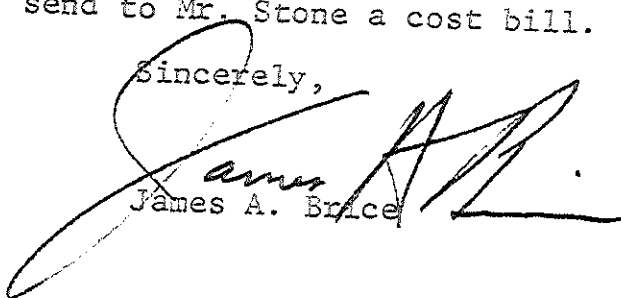
Re: C. P. Taylor
Vs: Redwing Carriers, Inc.
At Law, No. 4458

Dear Mrs. Duck:

Please dismiss the above case for the plaintiff as soon as you receive from Mr. Norborne C. Stone, Jr. a check for the costs.

If you will, kindly send to Mr. Stone a cost bill.

Sincerely,


James A. Brice

JAB:j

cc: Chason and Stone
Attorneys at Law
Bay Minette, Alabama