

STATE OF ALABAMA)
)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Eva Blackburn Pitts to appear and answer, plead or demur, within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held at the place of holding the same, then and there to answer to to the complaint of Ludy Anderson.

WITNESS my hand this the 19 day of December, 1960.

Alvin S. Luck
CLERK OF CIRCUIT COURT

LUDY ANDERSON,
Plaintiff

vs.

EVA BLACKBURN PITTS,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

4521

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Five Hundred Sixty and No/100 (\$560.00) Dollars as damages for that heretofore, on, to-wit, September 2, 1960, the Plaintiff's automobile was being operated along and upon a public street or highway in Baldwin County, Alabama, to-wit, U. S. Highway 98 at a point approximately one mile north of Daphne, Baldwin County, Alabama, where he had a right to be and while said automobile was being operated and driven by the Plaintiff, the Defendant, Eva Blackburn Pitts, negligently caused or allowed an automobile which she was then and there operating, to run upon, over or against the automobile of the Plaintiff, causing great damages and injuries to the Plaintiff's automobile: the top, front axle, left front wheel, front bumper, left front fender and other parts of the Plaintiff's automobile were broken, bent, smashed or otherwise damaged and injured, all to the damage of the Plaintiff as aforesaid. The Plaintiff avers that by reason of said injuries and damages he lost the use of said automobile and was compelled

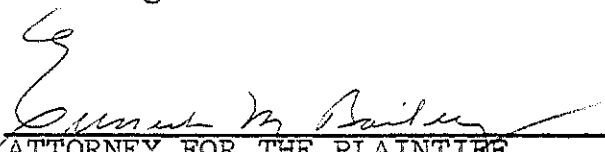
to hire transportation to his employment at great expense, to-wit, the sum of Three (\$3.00) Dollars per day, and avers that the same are reasonable charges and claims of the Defendant such sums as shall compensate him for the loss of the use of said automobile.

The Plaintiff alleges that said damages were proximately caused by the negligence of the Defendant and as a proximately consequence thereof the Plaintiff was damaged as aforesaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Five Hundred Sixty and No/100 (\$560.00) Dollars as damages for that heretofore on, to-wit, September 2, 1960, the Defendant, Eva Blackburn Pitts, wantonly injured the Plaintiff by wantonly causing or allowing an automobile which was being driven by the Defendant to run upon, over or against the automobile of the Plaintiff on a public street or highway in Baldwin County, Alabama, to-wit, at a point approximately one mile north of Daphne, Baldwin County, Alabama, on U. S. Highway 98 causing great damages and injuries to the Plaintiff's automobile; the top, front axle, left front wheel, left front bumper and fender and other parts of the Plaintiff's automobile were broken, bent, smashed or otherwise damaged and injured, all to the damage of the Plaintiff as aforesaid. The Plaintiff avers that by reason of said injuries he was compelled to hire transportation to his employment at great expense to him, to-wit, the sum of Three (\$3.00) Dollars per day and he avers that the same are reasonable and claims of the Defendant such sums as shall compensate him by reason of hiring such transportation.

The Plaintiff alleges that his said damages were proximately caused by said wanton conduct and as a proximate result of said wanton conduct the Plaintiff was damaged as aforesaid.


ATTORNEY FOR THE PLAINTIFF

FILED
DEC 19 1960

WILLIAM DUCK, Clerk

LUDY ANDERSON,

Plaintiff

vs.

EVA BLACKBURN PITTS,

Defendant

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NUMBER:

4521

FILED

DEC 19 1960

ALICE J. DUCK, Clerk

Defendant lives
in Daphne.

Received 19 day of Dec 1960
and on 5 day of Jan 1961
serve a copy of the within 90 C
on Eva Blackburn Pitts

By service on Eva Blackburn Pitts

TAYLOR WILKINS, Sheriff
By W. C. Garner Daphne

Sheriff claims 54 miles at
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff

BY Garner
DEPUTY SHERIFF