

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Claudia M. Brownlee and Ralph W. Moore to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Doyle Dunn.

Witness my hand this 8 day of July, 1960.

Deirdre H. Huch
Clerk

The address of the Defendant, Claudia M. Brownlee is 1810 Lacy Street, Mobile, Alabama.

The address of the Defendant, Ralph W. Moore is 1801 Stone Street, Mobile, Alabama.

4313

DOYLE DUNN,

Plaintiff,

vs.

CLAUDIA M. BROWNLEE and RALPH
W. MOORE,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

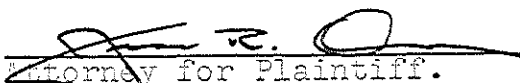
The Plaintiff claims of the Defendants the sum of Three Hundred Dollars (\$300.00) damages for that heretofore on to-wit, April 16, 1960, the Plaintiff was traveling in his automobile, which was being driven by the said Plaintiff, along Highway 90, a public highway in Baldwin County, Alabama, and at a point 1.6 miles east of the city limits of Mobile, Alabama, and which point is also directly north of the Site Service Station and directly south of Bill's Restaurant, and that while he was lawfully traveling upon said highway in an easterly direction in said automobile, which was his property, the Defendant, Claudia M. Brownlee.

who was then and there an agent, servant or employee of the Defendant, Ralph W. Moore, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated an automobile which she was driving as to cause it to strike, run upon, over, or against the automobile of the Plaintiff, and, as a proximate consequence of the Defendant's negligence, Plaintiff's automobile was damaged, bent and broken; the front bumper was bent, the right front fender was demolished, the hood was bent and damaged all to Plaintiff's damages as aforesaid. Plaintiff avers that all of his damages were caused as a proximate consequence of the negligence of the Defendant, Claudia M. Brownlee, who was then and there an agent, servant or employee of the Defendant, Ralph W. Moore, and who was acting within the line and scope of her authority as such agent, servant or employee at said time and place.

FILED

JUL 8 1960

ALICE L. DUCK, CLERK
REGISTER


Attorney for Plaintiff.

COMPLAINT

2223

W4313

DOYLE DUNN,

Plaintiff,

^{VS}
CLAUDIA M. BROWNLEE and
RALPH W. MOORE

Defendants.

EXECUTED
This 18 day of July, 1960
by serving a copy of the within on
Claudia M. Brownlee
RAY D. BRIDGES, Sheriff
By J. W. Walcomb D.S.

EXECUTED
This 18 day of July, 1960
by serving a copy of the within on
Ralph W. Moore
RAY D. BRIDGES, Sheriff
By J. W. Walcomb D.S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

JUL 8 1960

ALICE L. DUCK, CLERK
REGISTER

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

DOYLE DUNN,	§	IN THE CIRCUIT COURT OF
	§	
Plaintiff,	§	BALDWIN COUNTY, ALABAMA
	§	
vs.	§	
	§	
CLAUDIA M. BROWNLEE	§	
AND RALPH W. MOORE,	§	
	§	
Defendants.	§	

Comes now the Defendants in the above styled cause, and as answer to the Complainant's complaint, alleges as follows:

O N E

Not guilty.

T W O

The allegations of the complaint are untrue.

T H R E E

The Defendant, Ralph Moore, claims of the Plaintiff, Doyle Dunn, the sum of Three Hundred & No/100 (\$300.00) Dollars for that heretofore and on to-wit the 16th day of April, 1960, on United States Highway 90, a public highway in Baldwin County, Alabama, and at a point approximately one mile east of the city limits of Mobile, Alabama, Doyle Dunn did so negligently operate an automotive vehicle as to run on, over or against an automobile owned by Ralph W. Moore and being operated by Claudia M. Brownlee, and as a direct and proximate result of the negligence of Doyle Dunn, the automobile of Ralph W. Moore was badly bent, broken, or otherwise damaged, all for which Ralph W. Moore sues.

M. A. Marsal
M. A. Marsal, Attorney for
Defendants

The Defendants demand that this case be tried by a jury.

FILED
AUG 4 1960

ALICE J. DUCK, Clerk

M. A. Marsal
M. A. Marsal, Attorney for
Defendants