

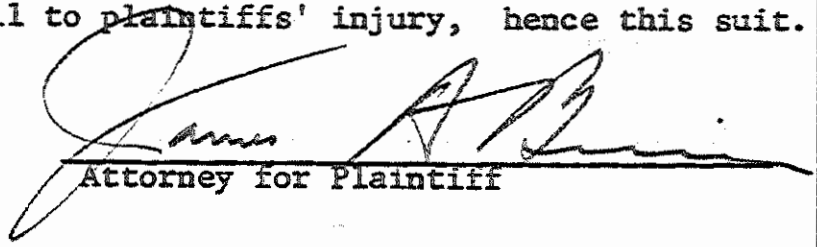
4378

Otto Schoen,
Plaintiff
Vs
Freeman Watson and
K. P. Mitchell,
jointly and individually
Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

I

Plaintiff claims of the Defendants the sum of Ten Thousand and No/100 (\$10,000.00) Dollars as damages, for that heretofore on, to wit, the 23rd day of April, 1958, the Defendant Freeman Watson, while acting within the line and scope of his employment as agent, servant or employee of the Defendant K. P. Mitchell, so negligently operated a motor vehicle northwardly on Alabama Highway #59, a public highway, at a point 3.5 miles north of the corporate limits of Foley, in Baldwin County, Alabama, by parking same in the right traffic lane of said highway, without lights or flares of warning, during darkness, so that the Plaintiff, operating his motor vehicle northwardly on said highway, ran upon and onto the said vehicle parked by the Defendant Freeman Watson, while acting within the line and scope of his employment as agent, servant, or employee of the Defendant K. P. Mitchell, the plaintiff was seriously and permanently injured, was made sick and sore, was caused to suffer great physical pain and mental anguish, the plaintiff's spine was injured, plaintiff's automobile was greatly damaged, and plaintiff was caused to incur expenses of doctors, x-rays, chiropractors and drugs in and about the care and treatment of his injuries as aforesaid, and will likely incur additional expenses of like nature in the future, all to plaintiffs' injury, hence this suit.


Attorney for Plaintiff

FILED
AUG 10 1960
ALBERT J. JACK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

Freeman Watson and K. P. Mitchell

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 _____

Freeman Watson and K. P. Mitchell, Defendant S

by Otto Schoen

_____, Plaintiff _____

Witness my hand this 10 day of August 1960

W. J. Smith, Clerk

No. 4378

Page 1

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Otto Schoen

Plaintiffs

vs.

Freeman Watson
and
K. P. Mitchell

Defendants

Summons and Complaint

Filed

FILED

19

AUG 10 1960

Clerk

**ALICE D. DUCK, CLERK
REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Freeman Watson
Brownley Ala

K. P. Mitchell

7788
7946
Defendant lives at

Received In Office

8/10, 1960

Sheriff.

I have executed this summons

this

Oct 29

1960

by leaving a copy with

K. P. Mitchell

Freeman Watson
Not found

Sheriff claims

20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY

W. O. Garner
DEPUTY SHERIFF

Taylor Wilkins
W. O. Garner

Sheriff.

Deputy Sheriff.

W. O. Garner

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

August 9, 1960

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

Dear Mrs. Duck:

I enclose initial pleadings on behalf of Otto Schoen against Freeman Watson and K. P. Mitchell. The former may be served at Bromley, Alabama, and the latter at Fairhope, Alabama.

Thank you.

Sincerely,



James A. Brice

JAB:j

Enc

cc: Mr. Otto Schoen
Elberta, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

K. P. Mitchell

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 _____

Freeman Watson and K. P. Mitchell, Defendant s

by Otto Schoen

_____, Plaintiff _____

Witness my hand this _____

10

day of

August

1960

Richard H. Hensley, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Otto Schoen

Plaintiffs

vs.

Freeman Watson

and

K. P. Mitchell

Defendants

Summons and Complaint

FILED

Filed _____ 19____

AUG 10 1960

ALICE T. DUCK, CLERK
REGISTER - Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

Received In Office

_____, 19____

Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff.

Deputy Sheriff.