

FILED

AUG 11 1960

MISSISSIPPI

STATE OF ALABAMA,
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LEE JOHNSON AND W. W. HUGHES 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 TELFAIR J. MASHBURN.

WITNESS my hand this the 11 day of August, 1960.

G. J. M. M. M.
CLERK

TELFAR J. MASHBURN,
Plaintiff,
VS.
LEE JOHNSON AND W. W. HUGHES,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 4381

C O U N T O N E

Plaintiff claims of the defendants the sum of SEVEN HUNDRED FIFTY AND NO/100ths (\$750.00) DOLLARS, as damages, for that, heretofore, on, to-wit: the 15th day of July, 1960, at about 5:45 P. M., o'clock, on Baldwin County Road Number 27, a public highway in Baldwin County, Alabama, which leads from Alabama Highway Number 59 to Live Oak Lodge, at a point where said highway intersects , or is intersected by, the old Stockton-Carpenter Station Road, the defendant, LEE JOHNSON, who was then and there an agent, servant, or employee of the defendant, W. W. HUGHES, acting within the line and scope of his employment as such, so negligently operated an automobile truck, which he was then and there driving, as to cause the same to run into, upon or against plaintiff's automobile, and as a proximate result and consequence thereof, plaintiff's said automobile was damaged in this, to-wit: the front bumper, both front fenders, the hood, radiator, fan, both front doors, both front panels, both front headlights were all badly bent and broken, the windshield (front) was broken, the battery and battery rack were bent and broken, and, in general, the entire front of the car was badly bent, broken and damaged; plaintiff was deprived of the use of his said automobile, which is used in his business, for a long period of time; all to the damage of the plaintiff as aforesaid; hence this suit.

Plaintiff requests a jury trial of this cause.

Telfair J. Mashburn
ATTORNEY FOR PLAINTIFF.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 4381

TELFAIR J. MASHBURN,
Plaintiff,

VS.

LEE JOHNSON AND W. W. HUGHES,
Defendants.

SUMMONS AND COMPLAINT.

The defendant, LEE JOHNSON,
lives in Douglasville

24X
The defendant, W. W. HUGHES
lives on Route 1, Box 580,
Saraland, Alabama--He works
for S. M. Adams, Inc., at
Plateau, Alabama

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ALICE L. DUCK, CLERK
REGISTER

Received 18 day of Aug 1960
and on 18 day of Aug 1960
I served a copy of the within Lee Johnson
on Lee Johnson

By service on

TAYLOR WILKINS, Sheriff
By W. A. Talbot D. S.
D. Vail

Sheriff claims 4 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY Talbot
DEPUTY SHERIFF

Received 22nd day of Aug 1960
and on 24th day of Aug 1960
I served a Copy of the within Summons & Complaint
on W W Hughes
by service on W W Hughes

RAY D. BRIDGNS, Sheriff
By B. F. Harris