

STATE OF ALABAMA)
*
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John N. Minchew 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 same, then and there to answer the complaint of Emmett Middleton.

Witness my hand this 16 day of August, 1960.

Alice J. Luck
Clerk.

EMMETT MIDDLETON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
JOHN N. MINCHEW,	X	LAW SIDE.
Defendant.	X	

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Thousand Five Hundred Dollars (\$2,500.00) as damages for that on, to-wit: April 24, 1960 the Defendant, acting by and through his agent, servant or employee who was then and there acting within the line and scope of his authority as such agent, servant or employee, was operating a ferry, for hire, in Baldwin County, Alabama at Marlow and at said time and place the Plaintiff, who was then and there driving his automobile, attempted to drive such automobile on such ferry in an effort to cross Fish River, after the agent, servant or employee of such Defendant had placed the ferry in such a position that such automobile could be driven upon the ferry and had motioned to the Plaintiff to drive upon it and the Defendant, through his agent, servant or employee, negligently failed to fasten such ferry to the land where the automobile was to be driven upon it. As a proximate result of the negligence of such Defendant, the ferry was pushed out into the River when the

Plaintiff attempted to drive his automobile upon it, thereby causing the automobile to fall into Fish River and such automobile was damaged in this: its transmission, engine, brake cylinders, air condition unit and all the electrical system of the automobile was seriously damaged by being submerged in such water, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON & STONE

By: 

Attorneys for Plaintiff

The Plaintiff demands a trial of this cause by a jury.

CHASON & STONE

By: 

Attorneys for Plaintiff

FILED

AUG 16 1960

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

EMMETT MIDDLETON,

Plaintiff,

vs.

JOHN N. MINCHEW,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

FILED
AUG 16 1960

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

Received 16 day of Aug 1960
and on 9 day of Sept 1960
served a copy of the within 29
on John N. Minchew
By service on _____

TAYLOR WILKINS, Sheriff

By Charles L. Hedges Ors.

Isley

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY [Signature] DEPUTY SHERIFF

