

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mabel Ganey 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 J. Eugene Sims.

WITNESS my hand, this 18 day of August, 1960.

Alice J. Duck
Clerk.

J. EUGENE SIMS,

Plaintiff,

VS.

MABEL GANEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

4389

C O M P L A I N T

COUNT ONE:

Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) for that heretofore on to-wit, July 1, 1960, Defendant so negligently operated an automobile at a point on Highway No. 47 at a point approximately eight miles North of Bay Minette in Baldwin County, Alabama, directly West of the Plaintiff's dwelling house so as to cause said automobile, which the Defendant was driving to run into, upon and against two automobiles of the Plaintiff to-wit: One 1957 Buick and one 1948 Ford; the Buick automobile of the Plaintiff was damaged as follows: the rear bumper, the right rear fender and the trunk were bent, damaged and broken; the Ford automobile of the Plaintiff was completely demolished. Plaintiff avers that all of his damages were caused as a proximate result of the negligence of the Defendant in and about the operation of her automobile at the time and place complained of, hence this suit.

FILED

18 1960

ALICE J. DUCK, CLERK

J. Eugene Sims
Attorney for Plaintiff

Received 18 day of Aug 1960
d on 18 day of Aug 1960
sent a copy of the within to C
Mabel Ganev

by service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot, S.
o mi

J. EUGENE SIMS,

Plaintiff,

VS.

MABEL GANEY,

Bay Minette

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

AUG 18 1960

NICK J. OWEN, CLERK
JAMES R. OWEN, REGISTER
ATTORNEY AT LAW
BAY MINETTE, ALABAMA