

JEROME JACKSON BOATWRIGHT,
PLAINTIFF,

VS.

CLYDE CHANDLER,

DEFENDANT.

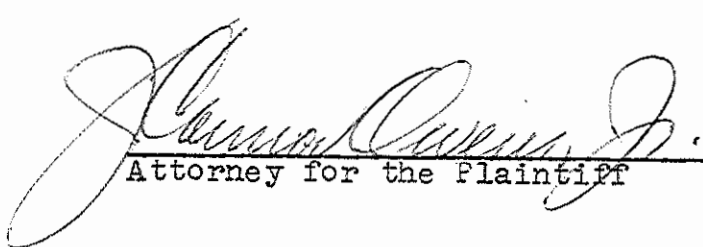
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW

NO. 4216

The plaintiff claims of the defendant the sum of \$337.54 as damages for that on heretofore, to-wit: the 30th day of January, 1960, at about 10:00 A.M., at the intersection of Highway 31 and Armstrong Avenue in the City of Bay Minette, Alabama, a public road in Baldwin County, Alabama, the defendant so negligently operated an automobile as to cause or allow the same to run into, upon or against the automobile of the plaintiff and which he was then and there operating and as a proximate consequence and result of the negligence of the defendant, aforesaid, the plaintiff's automobile was damaged in that the trunk and rear end of the automobile were torn, bent and smashed, the tail lights were knocked off, the back-up lights were broken, the frame of the automobile was bent, hence this suit.


Attorney for the Plaintiff

Received 24 day of March 1960
and on 26 day of March 1960
I served a copy of the within S & C
on Clyde Chandler

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot D. S.
4 miles south
of Bay minette

Sheriff claims 8 miles at
Ten Cents per mile Total \$.80
TAYLOR WILKINS, Sheriff
BY Taylor Wilkins
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN LAW NO. 4216

JEROME JACKSON BOATWRIGHT,
PLAINTIFF,

VS.

CLYDE CHANDLER,
DEFENDANT.

SUMMONS AND COMPLAINT

FILED

MAR 23 1961

ALICE L. DICK, CLERK
REGISTER

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.

MARCH TERM, 19 60

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CLYDE CHANDLER

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

CLYDE CHANDLER, Defendant...

by

JEROME JACKSON BOATWRIGHT, Plaintiff...

Witness my hand this 23 day of March 1960

Becky J. Rucker, Clerk

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19__

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19__

, Sheriff

I have executed this summons

this _____ 19__

by leaving a copy with

Sheriff

Deputy Sheriff