

DAVID CHARLES LAIRD,
PLAINTIFF,

VS.

M.L. SIMPSON and
LOTTIE J. RAWSON,
DEFENDANTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

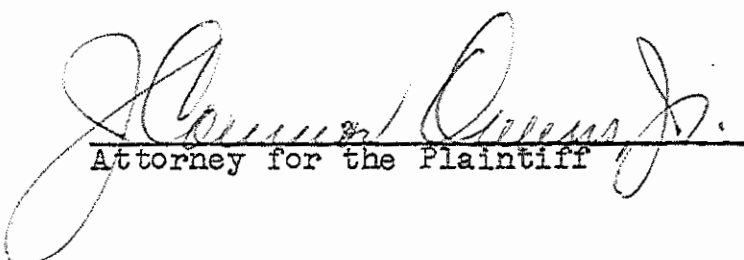
NO. 4223.

The plaintiff claims of the defendants the sum of \$250.00 as damages for that on heretofore, towit: September 13, 1959, at about 2:15 P.M. at Bill's Cafe, located on Hi-way 31, South of Bay Minette City Limits, approximately one mile South of said city limits, the defendant, Lottie J. Rawson, who was then and there acting as the agent, servant or employee of said defendant, M.L. Simpson, while acting in the line and scope of said employment, so negligently operated a motor vehicle so as to cause or allow the same to run into, upon or against the automobile of the plaintiff, which was then and there being operated by the plaintiff's wife, and as a proximate consequence and result of the negligence of the defendant, Lottie J. Rawson, who was then and there an agent, servant or employee of the defendant, M.L. Simpson, and acting within the line and scope of her employment, the plaintiff's automobile was damaged in that the side doors were bent in, the side glasses were knocked out, the aluminum strips were torn from the side of the plaintiff's automobile, therefore he brings this suit and asks judgment in the above amount.

FILED

MAR 31 1960

ALICE I. DUCK, Clerk


Attorney for the Plaintiff

Received 31 day of March 1967
and on 2 day of April 1967
I served a copy of the within B & C
on M. L. Simpson
Lottie J. Rawson
By service on _____

TAYLOR WILKINS, Sheriff
W. B. Talbot
4 miles south of
B-M.

Sheriff claims 16 miles at
Ten Cents per mile Total 160
TAYLOR WILKINS
BY Talbot
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW NO. 4223

DAVID CHARLES LAIRD,
PLAINTIFF,
VS.

M. L. SIMPSON and
LOTTIE J. RAWSON,
DEFENDANTS.

SUMMONS AND COMPLAINT

FILED
MAR 31 1967
ALICE J. DUCK, Clerk

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

LAW OFFICES

WALLACE L. JOHNSON, SR.

401-403 KARAGAN BUILDING . 132 ST. FRANCIS STREET

ASSOCIATE
KENNETH R. MARTIN

April 19, 1960

TELEPHONES HEMLOCK 8-5610
8-5619
MOBILE, ALABAMA

Mrs. Alice Duck
Circuit Clerk
County Court House
Bay Minette, Alabama

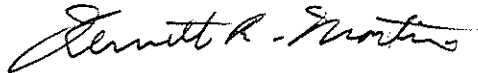
Re: David Charles Laird vs. M. L.
Simpson and Lottie J. Rawson

Dear Mrs. Duck:

I represent the defendants in the above styled cause. Please
file the enclosed answer to the bill of complaint.

With best regards and good wishes, I remain

Very truly yours,



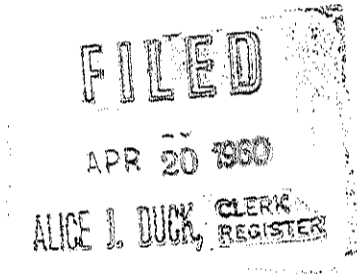
Kenneth R. Martin :

KRM/bw

Enclosure: 1 answer

DAVID CHARLES LAIRD,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	
)	BALDWIN COUNTY
VS.)	
)	ALABAMA
M. L. SIMPSON and)	
LOTTIE J. RAWSON,)	AT LAW
)	
Defendants.)	NO. _____

Comes now the defendants, M. L. Simpson and Lottie J. Rawson,
and for answer to the complaint heretofore filed in this cause say that
they are not guilty.



Kenneth R. Martin

 KENNETH R. MARTIN
 Attorney for Defendants

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

APRIL TERM, 1960

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon M.L. SIMPSON and

LOTTIE J. RAWSON

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

M.L. SIMPSON and LOTTIE J. RAWSON, Defendant_s

by DAVID CHARLES LAIRD

, Plaintiff

Witness my hand this 31 day of March 1960

Ex-4-260

Alice J. Luck, Clerk

No. _____ Page _____

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.