

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons MELBON E. BROUGHTON, to appear and plead, answer or demur within thirty days from the service hereto to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama at Law, by MARJORIE GATES, as Plaintiff and against Melbon E. Broughton, as Defendant.

Witness my hand this the 11 day of May, 1960.

Alice J. Duck
Alice J. Duck, Register

MARJORIE GATES

Plaintiff

VS

MELBON E. BROUGHTON

Defendant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO.

4252

1.

The Plaintiff, Marjorie Gates, claims of the Defendant the sum of FORTY-FIVE THOUSAND DOLLARS (\$45,000.00) as damages for that heretofore on to-wit, November 9, 1959, the Plaintiff was riding in an automobile being operated in a Westerly direction along and upon Alabama Highway #104; a public Highway in Baldwin County, Alabama, a place where she had a right to be; where Baldwin County Highway #27 intersects Alabama Highway #104; that at said time and place the Defendant, Melbon E. Broughton, who was driving an automobile in a Southerly direction on Baldwin County Highway #27, so negligently operated his automobile as to cause it to run into and against the automobile the Plaintiff was riding in; and as a direct proximate consequence and result thereof the Plaintiff was injured as follows: her back was seriously injured and permanently impaired, she received many bruises, contusions and lacerations about her body and limbs; she was caused to suffer much mental and physical pain, she was caused to

MARJORIE GATES	X	IN THE CIRCUIT COURT OF
Plaintiff	X	BALDWIN COUNTY, ALABAMA
vs	X	AT LAW
MELBON E. BROUGHTON	X	NO. 4252
Defendant	X	

Comes the Defendant in the above styled cause and for answer to said complaint filed in said cause shows unto this Honorable Court as follows:

-1-

Not guilty.

-2-

Now comes the Defendant, Melbon E. Broughton, and for answer to the said complaint says he has paid the debt or demand for the recovery of which this suit was brought, before this action was commenced.

THOMPSON & WHITE

BY: *C. L. Davis Thompson*
Attorneys for Defendant

Comes the Defendant and respectfully requests trial by jury in said cause.

THOMPSON & WHITE

BY: *C. L. Davis Thompson*
Attorneys for Defendant

FILED
JUN 28 1960
GLICE J. DUCK, Clerk

4252

FILED

JUN 28 1960

ALICE J. DUCK, Clerk

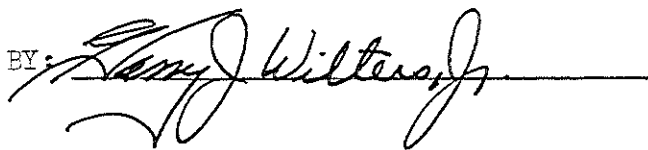
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incur great expense for medicine, surgical and hospital treatment, in and about the treatment of herself and will probably have to incur further expense in future, all to the loss of the Plaintiff in aforesaid amount.

2.

The Plaintiff, Marjorie Gates, claims of the Defendant the sum of FORTY-FIVE THOUSAND DOLLARS (\$45,000.00) as damages for that heretofore on to-wit, November 9, 1959, the Plaintiff was riding in an automobile being operated in a Westerly direction along and upon Alabama Highway #104; a public Highway in Baldwin County, Alabama, a place where she had a right to be; where Baldwin County Highway #27 intersects Alabama Highway #104; that at said time and place the Defendant, Melbon E. Broughton, who was driving an automobile in a Southerly direction on Baldwin County Highway #27, so wantonly operated his automobile as to cause it to run into and against the automobile the Plaintiff was riding in; and as a direct proximate consequence and result thereof the Plaintiff was wantonly injured as follows: her back was seriously injured and permanently impaired, she received many bruises, contusions and lacerations about her body and limbs; she was caused to suffer much mental and physical pain, she was caused to incur considerable expense for medicine, surgical and hospital treatment, in and about the treatment of herself and will probably have to incur further expense in future, all to the loss of the Plaintiff of aforesaid amount.

WILTERS, BRANTLEY AND NESBIT

BY: 

4252 ✓

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

MARJORIE GATES

Plaintiff

VS

MELBON E. BROUGHTON

Defendant

TAYLOR WILKINS, Sheriff

By W. C. Talbot D. S.

Omn

Address

White Horse Ranch

Filed
5-11-60
Acieff
Beck
Beck

WILTERS, BRANTLEY AND NESBIT

Robertsdale, Alabama

Received 11 day of May 1960
and on 13 day of June 1960
I served a copy of the within Summons
on Melbon E. Broughton

By service on _____