(4293)

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

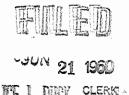
TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Eugene Eady and David Lee Hadley 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 James V. Blackmon as Administrator of the Estate of George T. Blackmon, Deceased.

Witness my hand this ______day of June, 1960.

	Q	Clerk / Wuch
JAMES V. BLACKMON, as Administrator of the Estate	Ĭ	
of George T. Blackmon, De- ceased,	X	IN THE CIRCUIT COURT OF
Plaintiff,	Ĭ	BALDWIN COUNTY, ALABAMA
	X	
EUGENE EADY and DAVID LEE HADLEY,	I	AT LAW
	X	
Defendants.	X	
	COUNT ONE	

The Plaintiff claims of the Defendants the sum of Five Hundred Dollars (\$500.00) as damages for that, on, to-wit: March 16, 1960, at a point on U. S. Highway 31, 600 feet North of the intersection of U. S. Highway 31 and Alabama Highway 59, in Stapleton, Baldwin County, Alabama, the Defendant Eugene Eady, acting by and through his agent, servant or employee David Lee Hadley, who was then and there acting within the line and scope of his authority as such agent, servant or employee, so negligently drove a motor vehicle in which the Plaintiff's intestate George T. Blackmon was then and there riding as a fare paying passenger, as to cause or allow it to collide with another motor vehicle and as a proximate result of the negligence of such Defendants the said George T. Blackmon received injuries from which he died, all to the damages of the Plaintiff in the above mentioned sum, hence this suit.



Attorneys for Plaintiff

JAMES V. BLACKMON as Administrator of the Estate of George T. Blackmon, Deceased,

Plaintiff,

VS.

EUGENE EADY and DAVID LEE HADLEY,

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

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LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

JAMES V. BLACKMON, As Administrator of the Estate of George T. Blackmon, Deceased,) IN THE CIRCUIT COURT OF) BALDWIN COUNTY, ALABAMA.
PLAINTIFF)
-vs-	AT LAW NO
EUGENE EADY and DAVID HADLEY, Separately and Severally,	
DEFENDANTS.	

PLEA.

Come the defendants in the above entitled cause and answering plaintiff's complaint and each and every count thereof separately and severally sets down and assigns the following plea:

1. Not guilty.

LYONS, PIPES & COOK

ATTORNEYS FOR THE DEFENDANTS.

VUN 21 1960 AUGE I. DUCK, CLERK REGISTER