

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. T. Holmes 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 same, then and there to answer the complaint of Kitchenaides, Inc., a Louisiana Corporation.

Witness my hand this 6 day of July, 1961.

Alice S. Luck
CLERK

Exp - 7-11-61

KITCHENAIDES, INC., A
Louisiana Corporation,

Plaintiff,

vs.

J. T. HOLMES,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

4747

COUNT ONE:

The Plaintiff claims of the Defendant Four Hundred Dollars (\$400.00) as damages for that on, heretofore, to-wit: the 21st day of December, 1960 at 8:30 P. M. the Defendant so negligently operated a motor vehicle on Alabama Highway #65 approximately two or three miles South of the intersection thereof with U. S. Highway #98, a public highway in Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, upon and against a motor vehicle of which the Plaintiff was in possession and as a proximate consequence and result of the negligence of the Defendant aforesaid, the automobile then and there in the possession of the Plaintiff was greatly damaged in this: both front fenders were bent and broken, the radiator was broken and had to be replaced, the front headlights were bent and broken, the front bumper was bent and broken, one of the front tires was destroyed,

the grill assembly was bent and broken and said automobile was otherwise bent, broken and damaged, all to the damage of the Plaintiff, wherefore he brings this suit and asks judgment in the above amount.

CHASON & STONE

By: 

Attorneys for Plaintiff

The Defendant resides near Foley, Alabama.

FILED
JUL 16 1962

ALICE J. DUCK, Clerk

4747
KITCHENAIDES, INC., A
Louisiana Corporation,

Plaintiff,

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J. T. HOLMES,

Defendant

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SUMMONS AND COMPLAINT

FILED

JUL 16 1961

ALICE J. DUCK, Clerk

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

Received 6 day of July 1961
and on 11 day of July 1961
I served a copy of the within on J. T. Holmes
on 9 day of July 1961
By service on _____

TAYLOR WILKINS, Sheriff

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Charles Childers
DEPUTY SHERIFF

APPEAL

Now comes Virginia Ferguson, Adm. of Estate of T. L. Ferguson, by her attorney, and appeals to the Circuit Court of Baldwin County, Alabama, from the final assessment made by the Board of Equalization of Baldwin County, Alabama, dated ^{on court} June 9th 1961 (Beat 2, Number 52).

Dated this 7th day of July, 1961.

VIRGINIA FERGUSON,
Adm. of Estate of T. L. Ferguson

By

J. B. Blackburn
As her Attorney

Filed 7-7-61
Deirdre French
Clerk