

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

MAY

TERM, 19 62

5124

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Juan D. Dean

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 \_\_\_\_\_

JUAN D. DEAN

Defendant

by \_\_\_\_\_

CLATYS WOODS

Plaintiff

Witness my hand this 30 day of ~~May~~ April 19 62.

EM 5-25-62

Alice J. Duck

Clerk

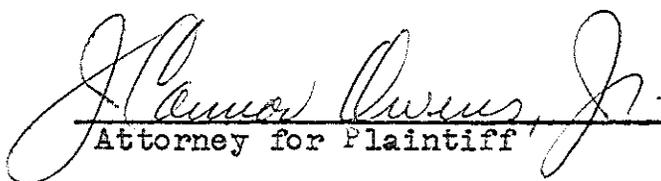
Defendant resides at: Rabun Route, Bay Minette, Alabama

CLATYS WOODS,  
Plaintiff,  
vs.  
JUAN D. DEAN,  
Defendant.

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

The Plaintiff claims of the Defendant the sum of \$700.00 as damages for that heretofore and on to-wit: February 3rd, 1962, the Plaintiff was lawfully operating his vehicle on Baldwin County Highway No. 47 in a Southerly direction on said road and at a point thereon 7.9 miles North of the city limits of Bay Minette, Alabama, which road at said point is a public road in Baldwin County, Alabama, and at the same time and at the same place, the Defendant, Juan D. Dean, so negligently operated a motor vehicle so as to cause or allow the same to run into, upon or against the vehicle owned by the Plaintiff, so that the Plaintiff's vehicle was broken, damaged, and crushed in that the left front side, fender, door, grill, motor, door framing and wheels were smashed and bent, and that the said damages to the Plaintiff were the proximate consequence of the negligence of the Defendant aforesaid, hence this suit.

  
Attorney for Plaintiff

Plaintiff demands that this cause be tried by Jury.



FILED  
APR 30 1962  
ALICE J. DUCK, CLERK  
REGISTER

Received 22 day of May 1962  
and on 25 day of May 1962  
I served a copy of the within 5/22  
on Juan D. Dean  
By service on Juan

TAYLOR WILKINS, Sheriff  
By W. A. Dahlbert

Sheriff claims 22 miles at  
Ten Cents per mile Total \$2.20  
TAYLOR WILKINS, Sheriff  
BY Dahlbert  
DEPUTY SHERIFF

Returned 14 day of May 1962  
Not found in my county after diligent search and in-  
quiry.

Taylor Wilkins, Sheriff  
By W. A. Dahlbert  
Deputy Sheriff

7344

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN LAW NO. 5124

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CLATYS WOODS,  
Plaintiff,

vs.

JUAN D. DEAN,  
Defendant.

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SUMMONS & COMPLAINT  
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FILED

APR 30 1962

ALICE J. DUCK, CLERK  
REGISTER

J. CONNOR OWENS, JR.  
ATTORNEY AT LAW  
Dahlberg Building  
BAY MINETTE, ALABAMA