

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 Eddie Lee Herrion and George Jefferson Herrion 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 J. John Burns.

Witness my hand this 4 day of June, 1962.

Walter J. Smith
Clerk

J. JOHN BURNS,

Plaintiff,

vs.

EDDIE LEE HERRION and
GEORGE JEFFERSON HERRION,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5765

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Four Hundred Fifty Dollars (\$450.00) as damages for that on, heretofore, to-wit: October 14, 1961, at a point approximately one-half mile South of the entrance to Lake Forest Estates on U. S. Highway 98, a public highway, in Baldwin County, Alabama, the Defendant, George Jefferson Herrion, who was then and there the agent, servant or employee of the Defendant, Eddie Lee Herrion, and acting within the line and scope of his authority as such agent, servant or employee did so negligently operate a motor vehicle as to cause or allow the same to run into or against a motor vehicle owned by the Plaintiff, and as a proximate result of the negligence of such Defendants, aforesaid, the automobile belonging to the Plaintiff was damaged in this: the rear bumper and both rear fenders were bent, damaged or broken; the tail

lights and the trunk lid were bent, damaged or broken; the gas tank and the gas tank unit were bent, damaged or broken, all to the damaged of the Plaintiff in the sum above mentioned, hence this suit.

FILED

JUN 4 1962

ALICE J. DUCK, CLERK
REGISTER

John Earle Chason
Attorney for Plaintiff

Ex- 6-6-62 on Eddie Lee Herriem
N.F. George J. Herriem

SUMMONS AND COMPLAINT

5165

J. JOHN BURNS,

Plaintiff,

VS.

Montreal
GH

EDDIE LEE HERRION and
GEORGE JEFFERSON HERRION,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

JUN 4 1962

ALICE J. DUCK,
CLERK
REGISTER

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

Sheriff claims _____
80
miles at _____
Ten Cents per mile Total \$ 8.00
TAYLOR WILKINS, Sheriff
By *Section*
Deputy Sheriff

Received _____ day of _____ 1962
and on _____ day of _____ 1962
I served a copy of the within _____
on: *George Jefferson Herrion*
at *George Jefferson Herrion*
By service on: *George Jefferson Herrion*
TAYLOR WILKINS, Sheriff
By *Section*
D. S. *of Clear*

Returned _____ day of _____ 1962

Not found in my county after diligent search and in-
quiry, as to *George Jefferson Herrion*
He is in the Army. *Taylor Wilkins, Sheriff*

By *Section*
Deputy Sheriff

J. JOHN BURNS,

Plaintiff,

VS.

EDDIE LEE HERRION and
GEORGE JEFFERSON HERRION,

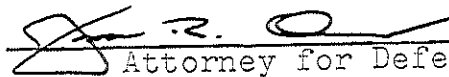
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

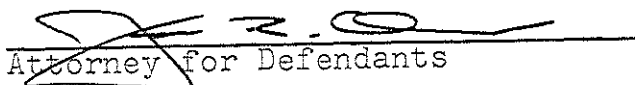
PLEA

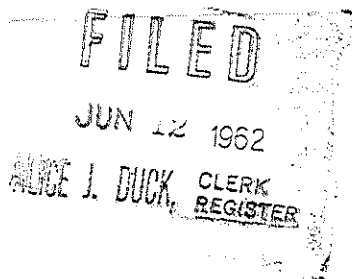
Now come the Defendants in the above styled cause and for
plea to the complaint heretofore filed in said cause say:

1. Not guilty.


Attorney for Defendants

Defendants demand a trial by jury of said cause.


Attorney for Defendants



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Witness my hand this 4 day of June, 1962.

Alice J. Duck
Clerk

J. JOHN BURNS,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	
	I	BALDWIN COUNTY, ALABAMA
EDDIE LEE HERRION and	I	
GEORGE JEFFERSON HERRION,	I	AT LAW
Defendants.	I	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Four Hundred Fifty Dollars (\$450.00) as damages for that on, heretofore, to-wit: October 14, 1961, at a point approximately one-half mile South of the entrance to Lake Forest Estates on U. S. Highway 98, a public highway, in Baldwin County, Alabama, the Defendant, George Jefferson Herrion, who was then and there the agent, servant or employee of the Defendant, Eddie Lee Herrion, and acting within the line and scope of his authority as such agent, servant or employee did so negligently operate a motor vehicle as to cause or allow the same to run into or against a motor vehicle owned by the Plaintiff, and as a proximate result of the negligence of such Defendants, aforesaid, the automobile belonging to the Plaintiff was damaged in this: the rear bumper and both rear fenders were bent, damaged or broken; the tail

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John Earle Chason
Attorney for Plaintiff

FILED

JUN 4 1962

ALICE J. DUCK, CLERK
REGISTER