

MRS. JUDY SNIDER,
PLAINTIFF.
VS.
BOYD EUGENE RODGERS,
DEFENDANT.

X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
LAW SIDE.
NUMBER: 521

5212

Comes now the Plaintiff and moves that this cause of action
be dismissed with the cost in said matter to be taxed against the
Defendant.

FILED

AUG 8 1962

ALICE J. DUCK, CLERK
REGISTER

HORNE, WEBB & TUCKER

BY: [Signature]
ATTORNEY FOR PLAINTIFF.

STATE OF ALABAMA X
BALDWIN COUNTY X

C I R C U I T C O U R T

TO: ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Boyd Eugene Rodgers to appear within thirty (30) days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held for said County at the place of holding same, then and there to answer, plead or demur to the complaint of Mrs. Judy Snider.

Witness my hand, this 13 day of July, 1962.

William J. Adams
CLERK.

C O M P L A I N T

MRS. JUDY SNIDER,	X	IN THE CIRCUIT COURT OF
PLAINTIFF.	X	BALDWIN COUNTY, ALABAMA.
VS.	X	LAW SIDE.
BOYD EUGENE RODGERS,	X	NUMBER <u>5211</u> .
DEFENDANT.	X	

COUNT ONE

The Plaintiff claims of the Defendant the sum of Fifteen Thousand and no/100 (\$15,000.00) Dollars as damages, for that, heretofore, on, to-wit, the 7th day of March, 1962, the Defendant so negligently operated a Ford pick-up truck on a public highway in Baldwin County, Alabama, to-wit, U. S. Highway Number 31, at a point on said public highway approximately 4/10 of a mile South of the town of Stapleton, Alabama, as to cause defendant's truck to collide with an automobile in which Plaintiff was then and there riding as a passenger and as a proximate consequence of the negligence of the Defendant at said time and place Plaintiff was severely and permanently injured in this:

Plaintiff's body was bruised, mutilated and injured; Plaintiff was bruised, cut and injured in her face, head and other parts of her body; plaintiff suffered severe lacerations of the face requiring thirty seven stitches to close; plaintiff was permanently disfigured;

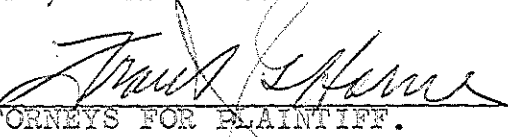
plaintiff was made sick, sore and lame; plaintiff was caused to suffer great physical and mental pain and anguish; plaintiff was caused to incur large doctor, hospital and medical bills in and about an effort to heal and cure her said injuries; plaintiff's physical stamina was impaired; plaintiff was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries.

COUNT TWO.

The Plaintiff claims of the Defendant the sum of Fifteen Thousand and no/100 (\$15,000.00) Dollars as damages for that heretofore on to-wit, the 7th day of March, 1962 while Plaintiff was riding in an automobile over which plaintiff had no charge, direction or control on a public highway in Baldwin County, Alabama, to-wit, U. S. Highway Number 31 at a point on said public highway approximately 4/10 of a mile South of the Town of Stapleton, Baldwin County, Alabama, the Defendant so negligently operated a truck he was then and there driving as to cause said truck to collide with the automobile in which Plaintiff was then and there riding as a passenger and as a proximate consequence of the negligence of defendant at said time and place plaintiff was severely injured in this:

Plaintiff's body was bruised, mutilated and injured; Plaintiff was bruised, cut and injured in her face, head and other parts of her body; Plaintiff suffered severe lacerations of the face requiring thirty seven stitches to close; Plaintiff was permanently disfigured; Plaintiff was made sick, sore and lame; Plaintiff was caused to suffer great physical and mental pain and anguish; Plaintiff was caused to incur large doctor, hospital and medical bills in and about an effort to heal and cure her said injuries; Plaintiff's physical stamina was impaired; Plaintiff was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries.

HORNE, WEBB & TUCKER

BY: 
ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved in this cause.

HORNE, WEBB & TUCKER

BY: 
ATTORNEY FOR PLAINTIFF.

Ex. 7-27-62

No. 5212

5212

Mrs. Judy Snyder

vs

Boyd Eugene Rogers

Received 23 day of July 1962
and on 27 day of July 1962
I served a copy of the within SV
on Boyd Eugene Rogers

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbert D. S.

Stapleton

Sheriff claims 24 miles at

Ten Cents per mile Total \$ 2.40

TAYLOR WILKINS, Sheriff

BY Talbert
DEPUTY SHERIFF

depts. address:
Stapleton, Ala.

Law Offices of
Horne, Webb & Tucker

Attorneys at Law

Atmore, Ala.

July 21, 1962

FRANK G. HORNE
DOUGLAS S. WEBB
J. R. TUCKER

TELEPHONE 368-3199

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

I am sending with this letter a Summons and Complaint in the case of Mrs. Judy Snider vs. Boyd Eugene Rodgers which we desire filed in your Court.

The Defendant resides at Stapleton, Alabama.

With kindest personal regards I remain;

Very truly yours,

HORNE, WEBB & TUCKER

BY:  Frank G. Horne

FGH/vje

Encl.