

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOHN A. RHODES 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 EMELIE MIKKELSEN.

WITNESS my hand this 7 day of August, 1962.


Clerk of the Circuit Court

* * * * *

EMELIE MIKKELSEN,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
JOHN A. RHODES,)	AT LAW
Defendant.)	NO. <u>5252</u>

COMPLAINT

COUNT I

The plaintiff claims of the defendant the sum of Ten Thousand Dollars (\$10,000.00) as damages for that on, to-wit, August 11, 1961, at the intersection of two paved county roads at or near the half section post on the south line of Section 2, Township 7 South, Range 3 East, Baldwin County, Alabama, the defendant then and there so negligently operated the motor vehicle which he was then and there driving as to cause it to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff was injured in this: Her right knee was cut, her left knee cap was injured, her left wrist was bruised, her right wrist was sprained, her chin was cut, her chest was bruised, her joints were caused to become stiff, she was caused to suffer severe pain and agony, she

was caused to incur doctor bills, hospital bills and other medical bills because of the said injuries, hence /this suit.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of this cause by jury.

J. B. Blackburn
Attorney for Plaintiff

FILED

AUG 2, 1962

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

EMELIE MIKKELSEN,

Plaintiff,

VS.

JOHN A. RHODES,

Defendant.

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

FILED

AUG 7 1962

ALICE J. DUCK, CLERK
REGISTER

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOHN A. RHODES 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 EMELIE MIKKELSEN.

WITNESS my hand this 7 day of August, 1962.

Alice J. Luck
Clerk of the Circuit Court

* * * * *

EMELIE MIKKELSEN,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	
)	AT LAW
JOHN A. RHODES,)	NO. <u>5232</u>
)	
Defendant.)	

COMPLAINT

COUNT I

The plaintiff claims of the defendant the sum of Ten Thousand Dollars (\$10,000.00) as damages for that on, to-wit, August 11, 1961, at the intersection of two paved county roads at or near the half section post on the south line of Section 2, Township 7 South, Range 3 East, Baldwin County, Alabama, the defendant then and there so negligently operated the motor vehicle which he was then and there driving as to cause it to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff was injured in this: Her right knee was cut, her left knee cap was injured, her left wrist was bruised, her right wrist was sprained, her chin was cut, her chest was bruised, her joints were caused to become stiff, she was caused to suffer severe pain and agony, she

was caused to incur doctor bills, hospital bills and other medical bills because of the said injuries, hence / this suit.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.

J. B. Blackburn
Attorney for Plaintiff

FILED
APR 1 1904
VNC. S. 1295
REGISTER
CLERK