

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 ROY MIKKELSEN.

WITNESS my hand this 7 day of August, 1962.

Alice J. Smith
Clerk of the Circuit Court

* * * * *

ROY MIKKELSEN,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
JOHN A. RHODES,)	AT LAW
Defendant.)	NO. <u>5223</u>

COMPLAINT

COUNT I

The plaintiff claims of the defendant the sum of Two Thousand and Dollars (\$2,000.00) 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 was then and there being driven by Emelie Mikkelsen, the wife of the plaintiff, and as a proximate consequence of the negligence of the said defendant the plaintiff's said wife was injured in this: Her right knee was cut, her left kneecap 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

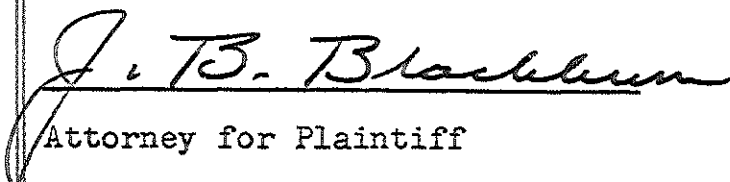
stiff, she was caused to suffer severe pain and agony, she was confined to bed for a long period of time and plaintiff was caused much expense for hospital bills, medical bills, doctor bills and the expenses incident thereto in obtaining medicines and medical aid and surgical attention for his said wife and was caused expense in the employment of doctors, physicians and surgeons in and about his efforts to heal and cure his said wife's injuries, and plaintiff was caused to lose time from his customary work, labor and duties and was caused much inconvenience in attending and nursing his said wife in an effort to alleviate her condition, and lost the services of his wife and her companionship or consortium for a long period of time, hence this suit.

COUNT II

The plaintiff claims of the defendant the sum of Fifteen Hundred Dollars (\$1500.00) 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 plaintiff's motor vehicle, to-wit, a four-door Chevrolet sedan, which was then and there being driven by plaintiff's wife, and as a proximate result and consequence of the negligence of the said defendant the plaintiff's said automobile was demolished and rendered unfit for use, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorney for Plaintiff

FILED

AUG 7 1962

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

ROY 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)

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WITNESS my hand this 7 day of August, 1962.

Alice J. Luck
Clerk of the Circuit Court

* * * * *

ROY MIKKELSEN,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
JOHN A. RHODES,)	AT LAW NO. <u>5233</u>
Defendant.)	

COMPLAINT

COUNT I

The plaintiff claims of the defendant the sum of Two Thousand Dollars (\$2,000.00) 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 was then and there being driven by Emelie Mikkelsen, the wife of the plaintiff, and as a proximate consequence of the negligence of the said defendant the plaintiff's said wife was injured in this: Her right knee was cut, her left kneecap 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 confined to bed for a long period of time and plaintiff was caused much expense for hospital bills, medical bills, doctor bills and the expenses incident thereto in obtaining medicines and medical aid and surgical attention for his said wife and was caused expense in the employment of doctors, physicians and surgeons in and about his efforts to heal and cure his said wife's injuries, and plaintiff was caused to lose time from his customary work, labor and duties and was caused much inconvenience in attending and nursing his said wife in an effort to alleviate her condition, and lost the services of his wife and her companionship or consortium for a long period of time, hence this suit.

COUNT II

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J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.

J. B. Blackburn
Attorney for Plaintiff