

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 Winston Hollis Danne 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 Betty Capers, a minor, suing by John H. Capers as her Father and next friend.

Witness my hand this the 28 day of September, 1962.

Alice J. Shuck
Clerk

BETTY CAPERS, A Minor, suing
by John H. Capers as her
Father and next Friend,

Plaintiff,

vs.

WINSTON HOLLIS DANNE,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

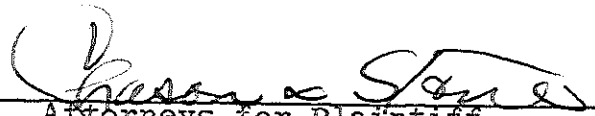
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that, on to-wit: September 8, 1962, at a point on Baldwin County Road #11, a public highway in Baldwin County, Alabama, about .3 miles South of its intersection with U. S. Highway #98, the Defendant negligently drove a motor vehicle into or against the automobile in which the Plaintiff was riding and as a proximate result of the negligence of such Defendant the Plaintiff was injured in this: five of her upper front teeth were knocked out; she received a cut in her chin; her lower lip was badly cut requiring many stitches; her right ankle was injured; she received cuts on her left leg and right wrist; she was badly bruised; she suffered severe pain and mental anguish; she was caused to incur large medical and hospital bills

and she is permanently injured, all to the damages of the Plaintiff in the sum above mentioned, hence this suit.


Attorneys for Plaintiff

The Plaintiff demands a trial of this cause by a jury.


Attorneys for Plaintiff

DEFENDANT'S ADDRESS:

Winston Hollis Danne
304 South Conception Street
Mobile, Alabama

FILED

SEP 28 1962

ALICE J. DUCK, CLERK
REGISTER

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BETTY CAPERS, A Minor, suing
by John H. Capers as her
Father and next Friend,

Plaintiff,

12/26 vs.

WINSTON HOLLIS DANNE,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED

SEP 28 1962

Alice I. Duck, CLERK
REGISTER

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

EXECUTED

This 12 day of Oct, 19 62

by serving a copy of the within on

Winston Hollis Danne

RAY D. BRIDGES, Sheriff

By J. Chambers D. S.

RECEIVED

OCT 1 1962

SHERIFF'S OFFICE

Defendant.

PLEA

1. Not guilty.

J. B. BLACKBURN and JAMES R. OWEN

ALICE L. DUCK, CLERK
REGISTER