

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 5332
6410

TO ANY SHERIFF OF THE STATE OF ALABAMA:

.....TERM. 19.....

You Are Hereby Commanded to Summon William Elonzo Rice, Jr.

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed
in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

William Elonzo Rice, Jr.,

....., Defendant.....

by Lavernia Willingham

....., Plaintiff.....

Witness my hand this 24 day of February 19 65

Alice J. Nick, Clerk

RECEIVED

No. 5332 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LAVORNIA WILLINGHAM

Plaintiffs

vs.

WILLIAM ELONZO RICE, Jr.

Defendants

SUMMONS AND COMPLAINT

Filed 2-24 1965

Alice J. Duck Clerk

C. G. Chason
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at OCT 3 1967

TAYLOR WILKINS

RECEIVED
Received In Office

2/24 APR 26 1965

TAYLOR WILKINS
SHERIFF Sheriff

I have executed this summons

this Oct 5 1967
by leaving a copy with

Returned 21 day of March 1965
Not found in my county after diligent search and
quint

Taylor Wilkins Sheriff
Roy Randall Deputy She

William Elonzo Rice Jr.

Point Clear
Sheriff claims 80 miles at

Ten Cents per mile Total \$ 8.00
TAYLOR WILKINS Sheriff


Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff

LAVORNIA WILLINGHAM,)	
)	
PLAINTIFF)	IN THE CIRCUIT COURT OF
)	
VS)	BALDWIN COUNTY, ALABAMA
)	
WILLIAM ELONZO RICE, JR.)	AT LAW <i>THE 14th</i>
)	
DEFENDANT)	

AMENDED COMPLAINT

The Plaintiff claims of the Defendant Five Thousand Dollars (\$5,000.00) damages , for that on, to-wit the 3rd day of April, 1962, while riding as a passenger in an automobile on Alabama Highway 59, at or near the intersection of County Road # 12, south of Foley in Baldwin County, Alabama, a public highway in the State of Alabama, where she had a right to be, the Defendant William Elonzo Rice, Jr. then and there negligently ran a vehicle operated by him into, upon or against the automobile in which the Plaintiff was riding and as a proximate consequence and result of said negligence of the Defendant in and about the operation of said motor vehicle, at said time and place, the Plaintiff was caused serious injury in that she was made sick and sore; she was caused to suffer great physical and mental anguish; she was caused to incur expenses of medical treatment, hospitalization, x-rays, ambulance services, and drugs in and about the care and treatment of her injuries; and she was permanently injured, all to Plaintiff's damage as aforesaid.


 Attorney for Plaintiff

Defendant resides in
 Fairhope, Alabama.

FILED

FEB 24 1962

WILLIAM ELONZO RICE, JR.

710-6415 5332

SUMMONS AND COMPLAINT

LAVORNIA WILLINGHAM,

PLAINTIFF

VS

WILLIAM ELONZO RICE, JR.

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

***** iff

FILED

FEB 24 1965

ALICE L. DUCK, CLERK

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

LAVORNIA WILLINGHAM
PLAINTIFF
VS
WILLIAM ELONZO RICE, JR.
DEFENDANT

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) AT LAW
)
) NUMBER: 5332
)

PLEA

Comes now Defendant in the above styled cause and for answer to the complaint in this cause says:

1. The action is barred by the statute of limitation of one year.

Willie H. Rice
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 12 day of Oct, 1967 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

Willie H. Rice

FILED
OCT 19 1967
ALICE J. DICK
CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

..... TERM, 19.....

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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

..... William Elonzo Rice, Jr., Defendant.....

by

..... Lovornia Willingham, Plaintiff.....

Witness my hand this 18 day of Oct 1962

Deicy Luck, Clerk

No. 5332

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Lavernia Willingham

Plaintiffs

vs.

William Elonzo Rice, Jr.

Defendants

Summons and Complaint

Filed

FILED

19

OCT 18 1962

Clerk

ALICE L. DICK, CLERK
REGISTER

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

Received In Office

_____, 19____

Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with

Returned 23 day of May 1962

Not found in my county after diligent search and
quity.

Taylor Wilkins, Sher

By

Deputy
Deputy Sheriff

Sheriff.

Deputy Sheriff.

LAVORNIA WILLINGHAM,

PLAINTIFF

VS

WILLIAM ELONZO RICE, JR.

DEFENDANT

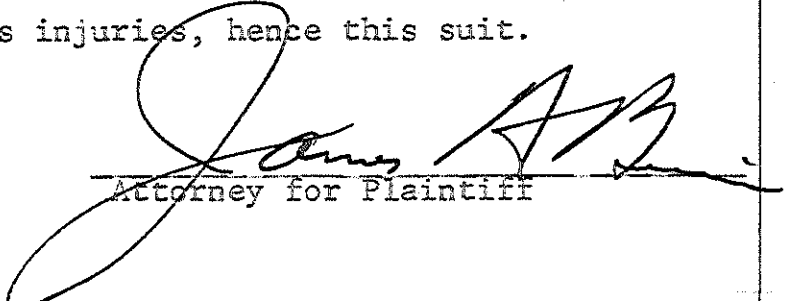
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW 332

COMPLAINT

Plaintiff claims of the Defendant One Thousand (\$1,000.00) Dollars as damages, for that heretofore on, to-wit: the 3rd day of April 1962 the Defendant, William Elonzo Rice, Jr., so negligently operated a motor vehicle owned by him eastwardly on County Road #12 at its intersection with Alabama Highway #59, both public roads in the County of Baldwin, State of Alabama, so as to cause or allow said vehicle to collide with a motor vehicle in which the Plaintiff was riding as a passenger and which said motor vehicle was being driven in a Southwardly direction on Alabama Highway #59, and as a direct and proximate result of the negligence of the Defendant, William Elonzo Rice, Jr., the Plaintiff was seriously and permanently injured, was made sick and sore, was caused to suffer great physical and mental anguish. Plaintiff has suffered and will continue to suffer pain for an indefinite time due to the injuries sustained in this accident; and Plaintiff was caused to incur expenses of Doctors, hospitals, nurses, x-rays, ambulances, and drugs in and about the care and treatment of her said injuries as aforesaid, all to Plaintiff's injuries, hence this suit.


Attorney for Plaintiff

Received 18th day of Oct 1962
and on _____ day of _____ 19____
I served a copy of the within LTC
on Wm. Elonzo Rice, Jr.

By service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

FILED

OCT 18 1962

ALICE L. DICK, CLERK
REGISTER

LAVORNIA WILLINGHAM,

PLAINTIFF

VS

WILLIAM ELONZO RICE, JR.

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

Plaintiff claims of the Defendant One Thousand (\$1,000.00) Dollars as damages, for that heretofore on, to-wit: the 3rd day of April 1962 the Defendant, William Elonzo Rice, Jr., so negligently operated a motor vehicle owned by him eastwardly on County Road #12 at its intersection with Alabama Highway #59, both public roads in the County of Baldwin, State of Alabama, so as to cause or allow said vehicle to collide with a motor vehicle in which the Plaintiff was riding as a passenger and which said motor vehicle was being driven in a Southwardly direction on Alabama Highway #59, and as a direct and proximate result of the negligence of the Defendant, William Elonzo Rice, Jr., the Plaintiff was seriously and permanently injured, was made sick and sore, was caused to suffer great physical and mental anguish. Plaintiff has suffered and will continue to suffer pain for an indefinite time due to the injuries sustained in this accident; and Plaintiff was caused to incur expenses of Doctors, hospitals, nurses, x-rays, ambulances, and drugs in and about the care and treatment of her said injuries as aforesaid, all to Plaintiff's injuries, hence this suit.


Attorney for Plaintiff

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The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

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-----, Defendant-----

by -----

Lovornia Willingham

-----, Plaintiff-----

Witness my hand this

19

day of

Oct

1962

Alicia J. Alusek

-----, Clerk

STATE of ALABAMA
Baldwin County
CIRCUIT COURT

Lavernia Willingham

Plaintiffs

vs.

William Elonzo Rice, Jr.

Defendants

Summons and Complaint

FILED

Filed

19

OCT 18 1962

**ALICE L. DICK, CLERK
REGISTER**

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

Received In Office

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Sheriff.

I have executed this summons

this 19

by leaving a copy with

Sheriff.

Deputy Sheriff.