

11833

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 Wyman L. Hallman 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 same, then and there to answer the complaint of Faye G. Catrett.

Witness my hand this the 24 day of August, 1961.

Alice S. Duck  
Clerk

Ex 8-24-61

FAYE G. CATRETT,	Y	
Plaintiff,	Y	IN THE CIRCUIT COURT OF
vs.	Y	
	Y	BALDWIN COUNTY, ALABAMA
WYMAN L. HALLMAN,	Y	
Defendant.	Y	AT LAW
	Y	

COUNT ONE:

The Plaintiff claims of the Defendant the sum of One Hundred Thousand Dollars (\$100,000.00) as damages for that, on to-wit August 2, 1961, at a point about five (5) miles Southwest of Bay Minette on U. S. Highway 31, in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle on such highway at said time and place as to cause or allow the same to run into or against an automobile which the Plaintiff was driving on said highway at said time and place and as a proximate result of the negligence of such Defendant the Plaintiff was permanently and seriously injured as follows: she was pregnant at the time and she received a severe blow in her stomach causing her to have a premature birth and causing the death of her unborn child; she received severe internal injuries; she was caused to lose much blood, she was rendered unconscious; her injuries required an operation in which her spleen was removed and her pancreas repaired; her

left arm was broken; she received a deep cut on her left elbow; she received severe bruises on both of her legs and on her body; she suffered severe pain and mental anguish; her health is permanently impaired; and she was caused to lose much time from her employment, all to the damages of the Plaintiff in the above mentioned sum, hence this suit.

COUNT TWO:

The Plaintiff further claims of the Defendant the sum of One Hundred Thousand Dollars (\$100,000.00) as damages for that on to-wit: August 2, 1961, at a point on U. S. Highway 31 in Baldwin County, Alabama, about five (5) miles Southwest of Bay Minette, Alabama, the Defendant wantonly injured the Plaintiff by wantonly causing a motor vehicle which he was then and there driving to run into or against the automobile which the Plaintiff was then and there driving and as a proximate result of such wantonness the Plaintiff was permanently and seriously injured in this: she was pregnant at the time and she received a severe blow in her stomach causing her to have a premature birth and causing the death of her unborn child; she received severe internal injuries; she was caused to lose much blood; she was rendered unconscious; her injuries required an operation in which her spleen was removed and her pancreas repaired; her left arm was broken; she received a deep cut on her left elbow; she received severe bruises on both of her legs and on her body; she suffered severe pain and mental anguish; her health is permanently impaired and she was caused to lose much time from her employment, all to the damages of the Plaintiff in the above mentioned sum, hence this suit.

  
Attorneys for Plaintiff

Plaintiff demands a trial of this  
cause by jury.

  
Attorneys for Plaintiff

FILED

AUG 24 1961

ALICE J. DUCK, CLERK  
REGISTER

FAYE G. CATRETT,

Plaintiff,

vs.

WYMAN L. HALLMAN,

Defendant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

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FILED

AUG 24 1961

ALICE J. DUCK, CLERK  
REGISTER

CHASON & STONE

ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

Received 24 day of August 1961  
and on 24 day of August 1961  
I served a copy of the within to  
on Wyman L. Hallman  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By [Signature] D.S.

Sheriff claims \_\_\_\_\_ miles at  
Ten Cents per mile Total \$ 4.00  
TAYLOR WILKINS, Sheriff  
BY [Signature]  
DEPUTY SHERIFF

FAYE G. CATRETT,

Plaintiff,

VS.

WYMAN L. HALLMAN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

MOTION TO STRIKE

Now comes the Defendant in the above styled cause and moves the Court to strike the complaint heretofore filed in said cause and each count thereof and as grounds for said motion assigns the following separately and severally:

1. Said pleading is unnecessarily prolix.
2. Said pleading is irrelevant.
3. Said pleading is frivolous.
4. Said pleading is unnecessarily repeated.

J. B. BLACKBURN and JAMES R. OWEN

By

J. B. Blackburn and James R. Owen  
Attorneys for Defendant

FILED

SEP 21 1961

ALICE J. DUCK, CLERK  
REGISTER

4833

FILED  
SEP 21 1961  
ALICE J. DUCK, CLERK  
REGISTER

TO THE COURT

IN THE MATTER OF

THE ESTATE OF

WILLIAM

17

WILLIAM

WILLIAM

WILLIAM

THE COURT HAS ORDERED THAT THE ESTATE OF WILLIAM

BE ADMINISTERED BY THE COURT AND THAT THE ESTATE OF WILLIAM

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