

4834

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 Clarence Roland, a minor, suing by John W. Roland as his Father and next friend.

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

Alice D. Buck
Clerk

CLARENCE ROLAND, A Minor,
suing by John W. Roland
as his Father and next
friend,

Plaintiff,

vs.

WYMAN L. HALLMAN,

Defendant.

X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

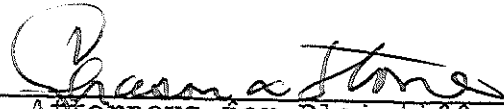
COUNT ONE:

The Plaintiff claims of the Defendant the sum of Twenty-five Thousand Dollars (\$25,000.00) 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 in which the Plaintiff was riding as a passenger at said time and place and as a proximate result of the negligence of such Defendant the Plaintiff was permanently and seriously injured in this: he received a skull fracture; he received a severe concussion; the vertebrae in his neck were damaged; his left jaw was broken; his left shoulder was injured; he suffered great pain and mental anguish; he was caused to lose time from

his employment; he was caused to incur large expenses for doctors, hospital, nurses and medicine and he is permanently injured, all to the damages of the Plaintiff, hence this suit in the above mentioned sum.

COUNT TWO:

The Plaintiff further claims of the Defendant the sum of Twenty-five Thousand Dollars (\$25,000.00) 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 wantonly injured the Plaintiff by wantonly causing a motor vehicle which he was then and there driving to run into or against the automobile in which the Plaintiff was riding as a passenger at said time and place and as a proximate result of such wantonness the Plaintiff was injured in this: he received a skull fracture; he received a severe concussion; the vertebrae in his neck were damaged; his left jaw was broken; his left shoulder was injured; he suffered great pain and mental anguish; he was caused to lose time from his employment; he was caused to incur large expenses for doctors, hospital, nurses and medicine and he is permanently injured, all to the damages of the Plaintiff, hence this suit in the above mentioned sum.


Attorneys for Plaintiff

Plaintiff demands a trial of this cause by a jury.


Attorneys for Plaintiff

FILED

AUG 24 1961

ALICE J. DUCK, CLERK
REGISTER

CLARENCE ROLAND, a Minor, suing
by John W. Roland, as his
Father and next friend,

Plaintiff,

vs.

WYMAN L. HALLMAN,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED

AUG 24 1921

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

Received 24 day of August 1921
and on 24 day of August 1921
I served a copy of the within on Wyman L. Hallman
By service on _____

TAYLOR WILKINS, Sheriff
By Taylor Wilkins D.S.

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY CC DEPUTY SHERIFF

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

FILED

SEP 21 1961

ALICE J. DUCK, CLERK
REGISTER

By 
Attorneys for Defendant

4834

FILED

SEP 21 1961

ALICE J. DUCK, CLERK
REGISTER