

41835

JUDITH CATRETT, A Minor,  
suing by George F. Catrett  
as her Father and next  
friend,

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

FILED

SEP 21 1961

ALICE J. DUCK, CLERK  
REGISTER

By

  
Attorneys for Defendant

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SEP 21 1961  
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SEP 21 1961

ALICE J. DUCK, CLERK  
REGISTER

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 Judith Catrett, a minor, suing by George F. Catrett as her Father and next friend.

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

  
Clerk

JUDITH CATRETT, A Minor,  
suing by George F. Catrett  
as her Father and next  
friend,

Plaintiff,

vs.

WYMAN L. HALLMAN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

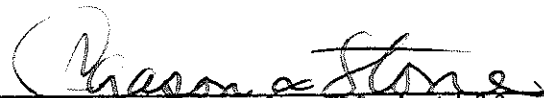
COUNT ONE:

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: she received severe cuts on her forehead and nose; she received cuts on her neck; she received a bad cut on the back of her left hand and one of her fingers on the

left hand was damaged to such an extent that it cannot be straightened; her knee was injured and she received multiple bruises and abrasions; she was caused to suffer great pain and mental anguish; she was caused to suffer large expenses for hospital, doctors, nurses and medicine in and about the care and treatment of her said injuries and she is permanently damaged, 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: she received severe cuts on her forehead and nose; she received cuts on her neck; she received a bad cut on the back of her left hand and one of her fingers on the left hand was damaged to such an extent that it cannot be straightened; her knee was injured and she received multiple bruises and abrasions; she was caused to suffer great pain and mental anguish; she was caused to suffer large expenses for hospital, doctors, nurses and medicine in and about the care and treatment of her said injuries and she is permanently damaged, 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 L. DUCK, CLERK  
REGISTER

JUDITH CATRETT, A Minor, suing  
by George F. Catrett as her  
Father and next friend,

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 21 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  
on Wyman L. Hallman  
By service on \_\_\_\_\_

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

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