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FILED

SEP 21 1961

ALICE J. DUCK, CLERK  
REGISTER

SECRET 2. 11/10/61

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TO THE ATTORNEY GENERAL

FROM THE ATTORNEY GENERAL

AT THE

SECRET 2. 11/10/61

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4. SECRET 2. 11/10/61

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

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 George F. Catrett.

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

Alice L. Luck  
Clerk

GEORGE F. CATRETT,

Plaintiff,

vs.

WYMAN L. HALLMAN,

Defendant.

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 Fifty Thousand Dollars (\$50,000.00) 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's wife, the said Faye G. Catrett, was then driving at said time and place and as a proximate result of such negligence the Plaintiff's said wife 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; she was caused to lose much time from employment; Plaintiff incurred as the result of such injuries large doctors, hospital, nurses and medical expenses in and about the treatment of his said wife's injuries; he suffered and will continue to suffer the loss of the services and the consortium of his wife for a long period of time, all to the damages of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff further claims of the Defendant the sum of Fifty Thousand Dollars (\$50,000.00) as damages for that, on-to-wit: August 2, 1961, on U. S. Highway 31, in Baldwin County, Alabama, at a point about five (5) miles Southwest of Bay Minette, Alabama, the Defendant wantonly injured Faye G. Catrett, the wife of the Plaintiff, by wantonly causing a motor vehicle which he was then and there operating to run into or against an automobile which the Plaintiff's wife was then driving and as a proximate result of such wantonness the Plaintiff's wife 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; she was caused to lose much time from her employment. And the Plaintiff incurred as the result of such injuries, large doctors, hospital, nurses and medical expenses in and about the treatment of his said wife's said injuries; he suffered and will continue to suffer the loss of the services and the consortium of his wife for a long period of time, all to the damages of the Plaintiff in the sum above mentioned, hence this suit.

Plaintiff demands a trial of this cause  
by a jury.

  
Attorneys for Plaintiff

FILED

AUG 24 1961

ANCE L DUCK, CLERK  
REGISTER

GEORGE F. CATRETT,  
Plaintiff,  
vs.

WYMAN L. HALLMAN  
Defendant

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

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SUMMONS AND COMPLAINT

\* \* \* \* \*

FILED

AUG 24 1961

AUGIE J. DUCK, CLERK  
REGISTER

CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

BY *[Signature]* D.S.

Received 24 day of Aug 1961  
and on 24 day of Aug 1961  
I served a copy of the within of Hallman  
on Hallman

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY *CC*  
DEPUTY SHERIFF