

41837

GLADYS SEBRING, A Minor,  
suing by Julian Sebring  
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

By J. B. Blackburn  
Attorneys for Defendant

FILED  
SEP 21 1961  
ALICE J. DUCK, CLERK  
REGISTER

4837

1. The first of the three items  
submitted in the "B" column  
of the first report was a  
copy of a letter from the  
Bureau dated 10/10/60.

2. The second item was a  
copy of a letter from the  
Bureau dated 10/10/60.

3. The third item was a  
copy of a letter from the  
Bureau dated 10/10/60.

4. The fourth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

5. The fifth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

6. The sixth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

7. The seventh item was a  
copy of a letter from the  
Bureau dated 10/10/60.

8. The eighth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

9. The ninth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

10. The tenth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

11. The eleventh item was a  
copy of a letter from the  
Bureau dated 10/10/60.

12. The twelfth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

13. The thirteenth item was a  
copy of a letter from the  
Bureau dated 10/10/60.

FILED

SEP 21 1961

ALICE J. DUCK,

CLERK  
REGISTER

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 Gladys Sebring, a minor, suing by Julian Sebring as her Father and next friend.

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

Walter D. Shuck  
Clerk

Exp 8-24-61

GLADYS SEBRING, A Minor,  
suing by Julian Sebring  
as her Father and next  
friend,

Plaintiff,

vs.

WYMAN L. HALLMAN,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

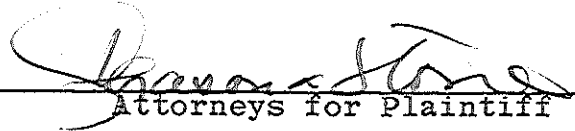
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) 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 a severe blow on her head; her teeth were damaged, she suffered multiple bruises and abraisions; she suffered great pain and mental anguish; she was caused to incur

large doctors, hospital and medical expenses in and about the treatment of her said injuries, all to the damages of the Plaintiff, hence this suit in the sum mentioned above.

  
Attorneys for Plaintiff

Plaintiff demands a trial of this cause  
by a jury.

  
Attorneys for Plaintiff

FILED

AUG 24 1961

ALICE J. BUCK, CLERK  
REGISTER

GLADYS SEBRING, A Minor, suing  
by Julian Sebring, 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 28 1961

ALICE L. 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 copy  
on Wyman L. Hallman  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
Baldwin County, Ala.

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