

GEORGE M. CATRETT, A Minor,  
suing by George F. Catrett  
as his Father and next  
friend,

Plaintiff,

VS.

WYMAN L. HALLMAN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

4838

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

1838

TO THE SECRETARY OF THE  
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FILED

1961

W. 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 George M. Catrett, a minor, suing by George F. Catrett as his Father and next friend.

Witness my hand this 24 day of August, 1961.

*Alice J. Cook*  
Clerk

*Exp 8-24-61*

GEORGE M. CATRETT, A Minor,  
suing by George F. Catrett  
as his Father and next  
friend,

Plaintiff,

vs.

WYMAN L. HALLMAN,

Defendant.

Y

Y

Y

Y

Y

Y

Y

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


COUNT ONE:

The Plaintiff claims of the Defendant the sum of One Thousand Dollars (\$1,000.00) 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 seriously injured as follows: he had a deep cut on his right hand; his finger on the right hand was seriously injured; he suffered much pain and mental anguish; he received many bruises and abraisions; and he was caused to incur doctors and medical expenses in and about the treatment of his said injuries, all to the damages of the Plain-

tiff, hence this suit in the above mentioned sum.

COUNT TWO:

The Plaintiff further claims of the Defendant the sum of One Thousand Dollars (\$1,000.00) 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 had a deep cut on his right hand; his finger on the right hand was seriously injured; he suffered much pain and mental anguish; he received many bruises and abrasions; and he was caused to incur doctors and medical expenses in and about the treatment of his said injuries, 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

GEORGE M. CATRETT, A Minor,  
suing by George F. Catrett  
as his 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 24 1961

ALICE J. DUCK, CLERK  
REGISTER

CHASON & STONE

ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

Received  
at the court of the within  
on Wymen L. Hallman  
By service on Taylor Wilkins Sheriff

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