

RECIPIENT:

Write your reply at bottom, mail back white sheet and keep the pink.

TO

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

FROM

JOHN V. DUCK & RICHARD G. LACEY
Attorneys At Law
319 Magnolia Avenue
FAIRHOPE, ALABAMA

SUBJECT:

Donald Henderson vs Gene Wade Brown
Frank O. Lee Williams vs Edmond S. S. S.

DATE:

10/14/63

Message - Reply

FOLD

THIS IS NCR (NO CARBON REQUIRED) PAPER.

JUST TYPE (OR WRITE) ON ORIGINAL. YOUR IMPRESSION
WILL AUTOMATICALLY APPEAR ON COPIES BENEATH.

Form 77 - New England Business Service, Inc. Townsend, Mass.

5775

Dear Mrs. Duck:

Enclosed you will find Summons & Complaint on the above.

Please file and have served.

JVD/cc

Sincerely,

SIGNED:

DATE OF REPLY:

REPLY TO:

John V. Duck

filed 10-15-63

Wade Brown

SIGNED:

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

MESSAGE

REPLY

DONALD HENDERSON

Plaintiff

-VS-

GENE WADE BROWN

Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
) AT LAW:
)
)

BILL OF COMPLAINT

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of FIFTY THOUSAND DOLLARS (\$50,000.00) as damages for that, heretofore, and on, to-wit, the 16th day of June, 1963, the Defendant so negligently operated a motor vehicle on highway numbered U. S. 90 at a point thereon at the east end of the Tensaw River Bridge, being then and there a public highway in Baldwin County, Alabama, so as to allow the vehicle in which said Plaintiff was riding to run into, upon or against the automobile of said Defendant, and as a proximate result of the negligence of the said Defendant, the Plaintiff received severe personal injuries in this, to-wit; his right arm was smashed, cut, and the ligaments and nerves therein were severed, that the skin thereon was peeled off, that he was made otherwise, sick, sore and lame, that he was bruised, that his limbs and body were lacerated, bruised and injured, he suffered other lacerations, abrasions and contusions, he suffered and continues to suffer great mental anguish and physical pain; that he was caused to lose much time from his work; and that he will in the future be required to lose more time from his work; that he was caused to incur great sums of money in and about the treatment of his injuries, for medical treatment, hospital services, nurses hire and the purchase of medicines and drugs; that he will continue in the future to incur great expense in and about the treatment of his injuries; that he was permanently injured; that he was rendered permanently less able to work, all as a proximate result of the negligence of the Defendant as aforesaid, for all of which he claims damages, hence this suit.

FILED

OCT 15 1963

ALICE J. DUCK, CLERK
REGISTER

[Signature]
~~Attorney for Plaintiff~~

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon GENE WADE BROWN

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

GENE WADE BROWN

_____, Defendant_____

by DONALD HENDERSON

_____, Plaintiff_____

Witness my hand this 15 day of Oct 1963

Alicia J. Kluwe, Clerk

No. 942

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

DONALD HENDERSON

Plaintiffs

vs.

GENE WADE BROWN

Defendants

12 & 1/2 hrs
move
Summons and Complaint

Filed _____ 19____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
12 South 3rd Street
Mobile, Alabama

Received In Office

_____, 19____

Sheriff.

I have executed this summons

this _____
by leaving a copy with

_____, 19____

Sh

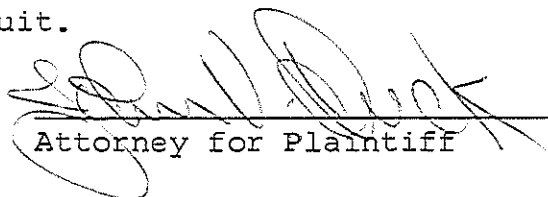
Deputy S

DONALD HENDERSON)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
-VS-)	AT LAW:
GENE WADE BROWN)	
Defendant)	

BILL OF COMPLAINT

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of FIFTY THOUSAND DOLLARS (\$50,000.00) as damages for that, heretofore, and on, to-wit, the 16th day of June, 1963, the Defendant so negligently operated a motor vehicle on highway numbered U. S. 90 at a point thereon at the east end of the Tensaw River Bridge, being then and there a public highway in Baldwin County, Alabama, so as to allow the vehicle in which said Plaintiff was riding to run into, upon or against the automobile of said Defendant, and as a proximate result of the negligence of the said Defendant, the Plaintiff received severe personal injuries in this, to-wit; his right arm was smashed, cut, and the ligaments and nerves therein were severed, that the skin thereon was peeled off, that he was made otherwise, sick, sore and lame, that he was bruised, that his limbs and body were lacerated, bruised and injured, he suffered other lacerations, abrasions and contusions, he suffered and continues to suffer great mental anguish and physical pain; that he was caused to lose much time from his work; and that he will in the future be required to lose more time from his work; that he was caused to incur great sums of money in and about the treatment of his injuries, for medical treatment, hospital services, nurses hire and the purchase of medicines and drugs; that he will continue in the future to incur great expense in and about the treatment of his injuries; that he was permanently injured; that he was rendered permanently less able to work, all as a proximate result of the negligence of the Defendant as aforesaid, for all of which he claims damages, hence this suit.


Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against -----

GENE WADE BROWN

-----, Defendant-----

by DONALD HENDERSON

-----, Plaintiff-----

Witness my hand this

15

day of

Oct

1962

NF

Reice J. Duck

-----, Clerk

STATE of ALABAMA
Baldwin County

CIRCUIT COURT

DONALD HENDERSON

Plaintiffs

vs.

GENE WADE BROWN

Defendants

Summons and Complaint

FILED

Filed 19

OCT 15 1965

Alice I. Duck, Clerk
REGISTER

RECEIVED

OCT 16 1965

SHERIFF'S OFFICE Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
12 South 3rd Street
Mobile, Alabama

Received In Office

Oct 15, 1963

Sheriff.

I have executed this summons

this 19

by leaving a copy with

10-25-63
RETURNED

Not found in my County

gent search and

RAY D. SANDERS Sheriff

H. H. Halley

Sheriff.

Deputy Sheriff.