CUNNINGHAM AND BOUNDS

ATTORNEYS AT LAW 1350 DAUPHIN STREET

P. O. BOX 4486

ROBERT T. CUNNINGHAM RICHARD BOUNDS MOBILE, ALABAMA

June 27, 1963

HEMLOCK 8-6188

Miss Alice Duck Clerk of the Circuit Court Baldwin County Bay Minette, Alabama

Dear Miss Duck:

Will you please file the enclosed complaints.

Sincerely yours,

CUNNINGHAM & BOUNDS

RICHARD BOUNDS

RB:sm

Enclosure

MAE MCALLISTER,

PLAINTIFF

٧S

CURTIS OSTEN MATTHEWS,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5620

Comes now the Defendant and for answer to Plaintiff's complaint says as follows:

l. Not guilty.

Attorney for Defendant

FILED

AUG 5 1963

ALCE 1. DUCK, CLERK REGISTER

MAE McALLISTER, : IN THE CIRCUIT COURT OF

Plaintiff, : BALDWIN COUNTY, ALABAMA

-Vs- AT LAW

CURTIS OSTEN MATTHEWS, : CASE NO. 1620

Defendant. :

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE THOUSAND AND NO/100 (\$5,000.00) DOLLARS, damages, for that heretofore and on, to-wit, May 4, 1963, the Defendant, CURTIS OSTEN MATTHEWS, so negligently operated an automobile on U. S. Highway 90, at or near its intersection with U.S. Highway 98 Cut-off, both of said roads being public roads in the County Of Baldwin, State of Alabama, so as to cause the same to collide with an automobile occupied by the Plaintiff's minor son at said time and place and as a direct and proximate result of the negligence of the Defendant as aforesaid the Plaintiff's son was injured and damaged as follows, to-wit: He was made sick, sore and lame; she suffered a severe injury to the transverse processes in his back; he was caused to suffer severe mental and physical pain and anguish, still so suffers and will so suffer in the future; he was caused to lose time from his employment and he was permanently injured. Plaintiff further avers that as a proximate result of said negligence and injuries to her minor son she was caused to incur medical expenses in and about the care and treatment of her son's injuries and she will incur further such expenses in the future and Plaintiff was caused to lose the services of her said son, for all of which she claims damages as aforesaid, hence this suit.

ROBERT T. CUNNINGHAM ATTORNEY FOR PLAINTIFF

ALIURALI FOR P.

RICHARD BOUNDS

4.5

ATTORIES DOOLD DI ATNITTE

Plaintiff demands a trial by jury.

RICHARD BOUNDS

Trial attorneys for this cause is Robert T. Cunningham and Richard Bounds

Defendant's Address:

Rt. 1, Box 322

Bay Minette, Alabama

FILED

INC. 1 1960

MINT I MINK REGISTER

The State of A		(Circuit Cor	ırt, Baldwin	County	
Baldwin C	ounty.	No. 5620				
TO ANY SHERIF	F OF THE S	TATE OF AL.	ABAMA		TERM	[, 19
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appear and plead, as	nswer or demur.	within thirty de	0770 fm			
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appear and plead, as	ldwin County, S	State of Alabama	a, at Bay Minet	te, against	, Defen	dant
appear and plead, as	ldwin County, S Curt	is Osten Mat	thews	te, against	, Defen	dant
appear and plead, as	ldwin County, S Curt Mae I	is Osten Mat	a, at Bay Mineti	te, against	, Defen	dant

STATE of Baldwin	County
CIRCUIT	COURT
MAE McAL	LISTER
vs.	Plaintiffs
CURTIS OSTI	EN MATTHEWS
	Defendants
Summons and	Complaint
išķ July 1,	1963
Alice J. Duck	G G Clerk
	•

Cunningham & Bounds
P.O. Box 44βfaintiff's Attorney
Mobile, Ala.

Defendant's Attorney

Defendant lives at

Received In Office

July 1, 1963

Sheriff. I have executed this summons

Centis Osten matth

Sheriff claims 20 miles at Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

Jayor Wilbing 180. Ill Sheriff.

White house Deputy Shoriff

RAYMOND D. McALLISTER, IN THE CIRCUIT COURT OF X a minor who sues by and through his mother and next friend, X BALDWIN COUNTY, ALABAMA MAE McALLISTER, χ AT LAW Plaintiff. Y vs. X CASE NO. CURTIS OSTEN MATTHEWS, Ĭ Defendant. Ĭ

COUNT ONE

Plaintiff claims of the Defendant the sum of TWENTY FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, damages, for that heretofore and on, to-wit, May 4, 1963, the Defendant, CURTIS OSTEN MATTHEWS, so negligently operated an automobile on U. S. Highway 90, at or near its intersection with U. S. Highway 98 Cut-off, both of said roads being public roads in the County of Baldwin, State of Alabama, so as to cause the same to collide with an automobile owned and occupied by the Plaintiff at said time and place and as a direct and proximate result of the negligence of the Defendant as aforesaid the plaintiff's automobile was bent, broken and damaged and he lost the use thereof over a period of time and the plaintiff suffered the following personal injuries: He was made sick, sore and lame; he suffered a severe injury to the transverse processes in his back; he was caused to suffer severe mental and physical pain and anguish, still so suffers and will so suffer in the future; he was caused to lose time from his employment; and he was permanently injured for all of which he claims damages as aforesaid, hence this suit.

COUNT TWO

The Plaintiff claims of the defendent the sum of TWENTY FIVE THOUSAND AND NO/100 (\$25,000.00) damages for that heretofore and on, to-wit, May 4, 1963, the defendant, CURTIS OSTEN MATTHEWS,

wantonly injured the plaintiff by wantonly operating an automobile on U.S. Highway 90 at or near its intersection with Highway 98 Cutoff, both of said roads being public roads in the County of Baldwin, State of Alabama, and so as to cause the same to then and there collide with an automobile owned and occupied by the plaintiff on said Highway 98 Cutoff and as a direct and proximate result of the wanton conduct of the defendant as aforesaid the plaintiff's automobile was bent, broken and damaged and he lost the use thereof over a period of time and the plaintiff suffered the following personal injuries: He was made sick, sore and lame; he suffered a severe injury to the transverse processes in his back; he was caused to suffer severe mental and physical pain and anguish, still so suffers and will so suffer in the future; he was caused to lose time from his employment; and he was permanently injured for all of which he claims damages as aforesaid, hence this suit.

ROBERT T. CUNNINGHAM
Attorney for Plaintiff

RICHARD BOUNDS

Attorney for Plaintiff

Plaintiff demands a trial by jury.

RICHARD BOUNDS

Trial attorney for this cause is Robert T. Cunningham and Richard Bounds.

Defendant's Address:

Rt. 1 Box 322 Bay Minette, Alabama

> FILED Jul I 1983

ALCE I WIX CLERK REDISTER

Circuit Court, Baldwin County Baldwin County. No. 5621 TERM, 19 TO ANY SHERIFF OF THE STATE OF ALABAMA You Are Commanded to Summon Curtis Osten Matthews Curtis Osten Matthews Curtis Osten Matthews Curtis Osten Matthews Defendant Curtis Osten Matthews Defendant Ourtis Mae McAllister Mae McAllister Mae McAllister Ourtis Osten Matthews Defendant Ourtis Mae McAllister Ourtis Osten Matthews Ourtis Matthews Ourtis Matthews Ourtis Matthews Ourtis Osten Matthews Ourtis Matthews		Circuit Court Baldwin	Country
Baldwin County. No. 5621 TERM, 19 TO ANY SHERIFF OF THE STATE OF ALABAMA You Are Commanded to Summon Curtis Osten Matthews o 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 Curtis Osten Matthews Defendant Oy Raymond D. McAllister, a minor who sues by and timugh his mather and next fri	The State of Alabama,		County
TERM, 19 TO ANY SHERIFF OF THE STATE OF ALABAMA Ou Are Commanded to Summon Curtis Osten Matthews Description 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 Curtis Osten Matthews Defendant Our Raymond D. McAllister, a minor who sues by and though his mather and next fri		No. 5621	
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he Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against	V	· · · · · · · · · · · · · · · · · · ·	
Nae McAllister	o appear and plead, answer or de	emur, within thirty days from the service hereof,	to the complaint filed in
Mae McAllister , Plaintiff ,			
		nty, State of Alabama, at Bay Minette, against _	
Vitness my hand this lst day of xxx July 1963	he Circuit Court of Baldwin Cou	nty, State of Alabama, at Bay Minette, against	, Defendant
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No.	_5621

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STATE of ALABAMA

Baldwin County

CIRCUIT COURT

RAYMOND D. McALLISTER, a minor who sues by and through his mother and next Friend, MAE McAllister

Plaintiffs

VS.

CURTIS OSTEN MATTHEWS

__Defendants

Summons and Complaint

Filed July 1, 1963

Alice J. Duck Clerk

P.O. Box 4486 Plaintiff's Attorney Mobile, Alabama

Defendant's Attorney

Defendant lives at

Received In Office

Sheriff.

I have executed this summons

this_____by leaving a copy/with

Curtis Osten Matthew

Sheriff claims 20 miles af

Ten Cents per mile Total & Startiff
Ten Cents per mile Total & Sheriff
TAYLOR WILKINS, Sheriff

BY WA DISTORY SHEKING

Leybor Welberge Sheriff.

While house Departy Sterif

RAYMOND D. McALEISTER, a minor who sues by and through his mother and next friend, MAE McALLISTER,

PLAINTIFF

VS

CURTIS OSTEN MATTHEWS,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5621

Comes now the Defendant and for answer to Plaintiff's complaint says as follows:

1. Not guilty.

FILED

AUG 5 1963

ALICE I DUSK, CLERK

Attorney for Defendant

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