

CUNNINGHAM AND BOUNDS

ATTORNEYS AT LAW

1350 DAUPHIN STREET

P. O. BOX 4486

MOBILE, ALABAMA

ROBERT T. CUNNINGHAM
RICHARD BOUNDS

June 27, 1963

HEMLOCK 8-6188

5620


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
VS
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:

1. Not guilty.


Attorney for Defendant

FILED


AUG 5 1963

ALICE J. DUCK, CLERK
REGISTER

MAE McALLISTER, : IN THE CIRCUIT COURT OF
 Plaintiff, : BALDWIN COUNTY, ALABAMA
 -Vs- : AT LAW
 CURTIS OSTEN MATTHEWS, : CASE NO. 5620
 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


 RICHARD BOUNDS
 ATTORNEY FOR PLAINTIFF

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

JUL 1 1963

ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 5620

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Curtis Osten Matthews

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

Curtis Osten Matthews

, Defendant

by Mae McAllister

, Plaintiff

Witness my hand this 1st day of July 1963

Ex 7-11-63

Oliver J. Luck, Clerk

No. 5620

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

MAE McALLISTER

Plaintiffs

vs.

CURTIS OSTEN MATTHEWS

Defendants

Summons and Complaint

Filed ~~33~~ July 1, 1963

Alice J. Duck

Clerk

Cunningham & Bounds

P.O. Box 4486
Mobile, Ala.

Plaintiff's Attorney
Defendant's Attorney

Defendant lives at

Received In Office

July 1, 1963

Sheriff.

I have executed this summons

this 11 July 1963
by leaving a copy with

Curtis Osten Matthews

Sheriff claims 20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY W. A. Tolbut
DEPUTY SHERIFF

Taylor Wilkins
W. A. Tolbut
White house fork
Sheriff.
Deputy Sheriff.

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

Plaintiff,

vs.

CURTIS OSTEN MATTHEWS,

Defendant.

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW

X

X

X

CASE NO.

5621


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 defendant 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 1 1963

ALICE I. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 5621

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

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Curtis Osten Matthews

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 -----

Curtis Osten Matthews -----, Defendant-----

by Raymond D. McAllister, a minor who sues by and through his mother and next friend,

Mae McAllister -----, Plaintiff-----

Witness my hand this 1st day of Jul July 1963

Ex: 7-11-63

Alice J. Duck -----, Clerk

No. 5621 Page

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

Cunningham & Bounds

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

Defendant's Attorney

Defendant lives at

Received In Office

July 1, 1963

Sheriff.

I have executed this summons

this 11 July 1963
by leaving a copy with

Curtis Osten Matthews

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

TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
DEPUTY SHERIFF

Taylor Wilkins
W. A. Tolbert Sheriff.
White-house fork Deputy Sheriff.

RAYMOND D. McALLEISTER,
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. DUCK, CLERK
REGISTER


Attorney for Defendant

437