

LUCIA C. ANDRESS,
Plaintiff

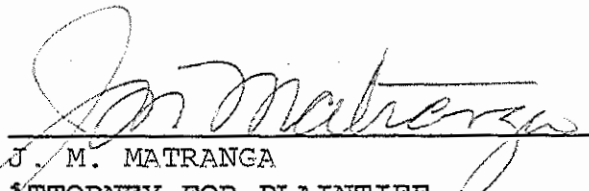
VS.

PRITCHETT LOFTIN,
Defendant.


* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
*
* AT LAW.
* CASE NO. 5638

Plaintiff claims of the Defendant the sum of TWENTY THOUSAND AND NO/100 (\$20,000.00) DOLLARS as damages, for that heretofore on, to-wit, June 19, 1963 while the Plaintiff was operating her automobile on U. S. Highway 98, a public highway in Baldwin County, Alabama near Daphne, Alabama the Defendant so negligently operated his automobile so as to cause the said to collide with the automobile being driven by the Plaintiff and as a proximate consequence thereof Plaintiff was injured and damages as follows: Plaintiff suffered severe lacerations about the face and body; Plaintiff was severally bruised; Plaintiff was caused to undergo surgical treatment; Plaintiff suffered severe intestinal injuries. Plaintiff was caused to spend money on doctors bills, medical bills, drug bills; Plaintiff was caused to lose time from her work; Plaintiff suffered permanent scars; Plaintiff suffered severe physical pain and mental anguish.

And Plaintiff avers that all her said injuries and damages were caused as a proximate result of the negligence of the Defendant in and about the operation of said motor vehicle at said time and place.


J. M. MATRANGA
ATTORNEY FOR PLAINTIFF

Plaintiff demands trial by jury.


J. M. MATRANGA

Defendant can be served at: Pritchett Loftin, 473 Wellington Street, Mobile, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5638

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Pritchett Loftin

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

Pritchett Loftin, Defendant

by

Lucia C. Andress, Plaintiff

Witness my hand this 19 day of July 19 63

64-8-5-63

Lucia C. Andress, Clerk

No. 5638

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

LUCIA C. ANDRESS

Plaintiffs

vs.

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PRITCHETT LOFTIN

Defendants

SUMMONS and COMPLAINT

Filed 7-19, 19 63

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

July 19, 19 63

, Sheriff

I have executed this summons

this August 5, 19 63

by leaving a copy with

Pritchett Loftin

Ray D. Bridges, Sheriff

Deputy Sheriff