

MRS. WILLIAM L. LEE

PLAINTIFF

VS

DONALD OLA GAYLOR

DEFENDANT

IN THE CIRCUIT COURT OF

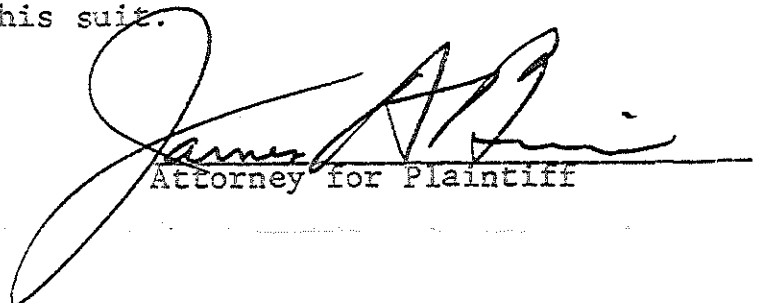
BALDWIN COUNTY, ALABAMA

AT LAW

5858

COMPLAINT

The Plaintiff claims of the Defendant Two Thousand Five Hundred Dollars (\$2,500.00) as damages for that heretofore on, to-wit: the 28th day of December 1962 the Plaintiff was operating a motor vehicle eastwardly on U. S. Highway 98 at the point of its intersection with Baldwin County Highway No. 65 in Baldwin County, Alabama, where she had a lawful right to be, and the defendant, Donald Ola Gaylor, so negligently operated a motor vehicle then and there as to cause said motor vehicle to run into, upon and against the automobile the Plaintiff was operating; the Plaintiff avers that as a proximate consequence thereof the Plaintiff was injured in and about her mouth, right wrist, right knee and chest; she suffered expenses and hospital bills, doctors and medicines and has and will continue to suffer pain and suffering and was made sick, sore, weak and weary as a proximate consequence of the negligence of the Defendant as aforesaid; in addition Plaintiff suffered loss of income from physical disability incurred as a result of said negligence of the Defendant, all to Plaintiff's damage, hence this suit.


Attorney for Plaintiff

FILED

DEC 10 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.

..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Donald Ola Gaylor

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

Donald Ola Gaylor....., Defendant.....

by

Mrs. William L. Lee....., Plaintiff.....

Witness my hand this 10 day of Dec 1963

64-1-6-64

Alice X Duck....., Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Mrs. William L. Lee

Plaintiffs

vs.

Donald Ola Gaylor

Defendants

Summons and Complaint

Filed

FILED

19

DEC 10 1963

Clerk

ALICE L. DICK, CLERK
REGISTER

RECEIVED

DEC 11 1963

SHERIFF'S OFFICE

James A. Brier

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

710 Merwina Avenue
Mobile, Alabama

Received In Office

Dec. 10, 1963

Sheriff.

I have executed this summons

this

1-6

1964

by leaving a copy with

Donald Ola Gaylor

Ray L. Bridges

Sheriff.

H. H. Jones

Deputy Sheriff.