

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MOST REVEREND T. J. TOOLLEN, BISHOP OF MOBILE, a corporation sole, and THEODORE HAY, Pastor of St. John's Catholic Church, Vernant Park, Baldwin County, Alabama, 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, Alabama, by CLARISSA WEEKS.

WITNESS my hand this \_\_\_\_\_ day of March, 1964.

Clerk of the Circuit Court

\* \* \* \* \*

CLARISSA WEEKS,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
MOST REVEREND T. J. TOOLLEN,	)	AT LAW
BISHOP OF MOBILE, a corpor-	)	
ation sole, and THEODORE HAY,	)	
Pastor of St. John's Catholic	)	
Church, Vernant Park, Baldwin	)	
County, Alabama,	)	
	)	
Defendants.	)	

NO. 5914

COMPLAINT

The plaintiff claims of the defendants the sum of TEN THOUSAND DOLLARS (\$10,000.00) as damages for that on, to-wit, the 10th day of March, 1963, the defendants kept, conducted and operated a church at Vernant Park in Baldwin County, Alabama, known as St. John's Catholic Church, as a place of worship for the members of the congregation of the said church, and the plaintiff avers that on the said date she was a member of the congregation of the said church and entered the church maintained by the defendants as aforesaid for the purpose of attending a service at the said church, and

while leaving the church building she slipped and fell on the steps and as a proximate consequence thereof she was injured and damaged as follows: Her arm was broken; she was bruised; her arm was permanently injured; she was made sick and sore; her nervous system was impaired; she was shocked and permanently injured and caused to suffer great physical and mental anguish and to incur large medical, hospital and doctor bills in and about the treatment of her said injuries.

Plaintiff further avers that all of her said injuries were caused as a proximate consequence of the negligence of the defendants in that the defendants negligently maintained the said steps at the place where the plaintiff slipped and fell in an unsafe condition for the use of the members of the said church.

WHEREFORE, plaintiff brings this action and asks damages of the defendants in the above amount.

  
Attorney for Plaintiff

Plaintiff demands a trial of  
this cause by jury.

  
Attorney for Plaintiff

**FILED**

MAR 6 1964

ALICE L. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

CLARISSA WEEKS,

Plaintiff,

VS.

MOST REVEREND T. J. TOOLEN, BISHOP  
OF MOBILE, a corporation sole, and  
THEODORE HAY, Pastor of St. John's  
Catholic Church, Vernant Park,  
Baldwin County, Alabama,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

J. B. BLACKBURN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MOST REVEREND T. J. TOOLEN, BISHOP OF MOBILE, a corporation sole, and THEODORE HAY, Pastor of St. John's Catholic Church, Vernant Park, Baldwin County, Alabama, 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, Alabama, by CLARISSA WEEKS.

WITNESS my hand this \_\_\_\_\_ day of March, 1964.

\_\_\_\_\_  
Clerk of the Circuit Court

\* \* \* \* \*

CLARISSA WEEKS,

VS.

Plaintiff,

MOST REVEREND T. J. TOOLEN,  
BISHOP OF MOBILE, a corpor-  
ation sole, and THEODORE HAY,  
Pastor of St. John's Catholic  
Church, Vernant Park, Baldwin  
County, Alabama,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5964

#### COMPLAINT

The plaintiff claims of the defendants the sum of TEN THOUSAND DOLLARS (\$10,000.00) as damages for that on, to-wit, the 10th day of March, 1963, the defendants kept, conducted and operated a church at Vernant Park in Baldwin County, Alabama, known as St. John's Catholic Church, as a place of worship for the members of the congregation of the said church, and the plaintiff avers that on the said date she was a member of the congregation of the said church and entered the church maintained by the defendants as afore-said for the purpose of attending a service at the said church, and


while leaving the church building she slipped and fell on the steps and as a proximate consequence thereof she was injured and damaged as follows: Her arm was broken; she was bruised; her arm was permanently injured; she was made sick and sore; her nervous system was impaired; she was shocked and permanently injured and caused to suffer great physical and mental anguish and to incur large medical, hospital and doctor bills in and about the treatment of her said injuries.

Plaintiff further avers that all of her said injuries were caused as a proximate consequence of the negligence of the defendants in that the defendants negligently maintained the said steps at the place where the plaintiff slipped and fell in an unsafe condition for the use of the members of the said church.

WHEREFORE, plaintiff brings this action and asks damages of the defendants in the above amount.

  
Attorney for Plaintiff

Plaintiff demands a trial of this cause by jury.

  
Attorney for Plaintiff

**FILED**

MAR 6 1924

ALICE J. DUCK, CLERK  
REGISTER