

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Cal Taylor to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of Yvonne T. Pearson.

Witness my hand this 21 day of July, 1964.

Debra L. ...
Clerk

YVONNE T. PEARSON,

Plaintiff,

vs.

CAL TAYLOR,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

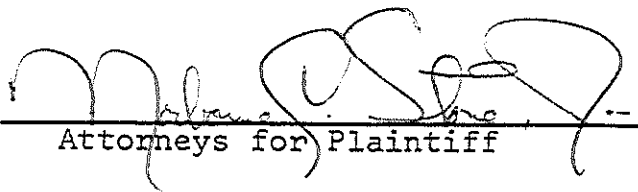
AT LAW

The Plaintiff claims of the Defendant the sum of Ten Thousand Dollars (\$10,000.00) for that on, heretofore, to-wit: the 14th day of June, 1964, at approximately 3:30 P. M. the Defendant so negligently operated an automobile at the intersection of Baldwin County Highway #50 with Baldwin County Highway #71 in Baldwin County, Alabama, as to cause or allow the same to run into, upon and against an automobile in which the Plaintiff was riding and as a proximate consequence and result of the negligence of the Defendant, aforesaid, the Plaintiff was severely injured in this: she was knocked unconscious, she suffered brain and head injuries, she suffered a severe concussion, her spinal chord was injured, her face and head became swollen and remained

swollen for a long period of time, she suffered, and continues to suffer, severe pain and mental anguish, she was caused to be hospitalized and thereby incurred hospital and drug bills, she was caused to incur doctors' bills and it was necessary that she employ someone to do her house work; all to the damage of the Plaintiff, wherefore she brings this suit and asks judgment in the above amount.

CHASON, STONE & CHASON

By:


Attorneys for Plaintiff

FILED

JUL 21 1964

ALICE L. DUCK, CLERK
REGISTER

EY-7-24-64

7/21/64

Yvonne T. Pearson

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Cal Taylor

Received 21 day of July 1964
and on 21 day of July 1964
I received a copy of the within Doc
on Cal Taylor

By service on _____

TAYLOR WILKINS, Sheriff

By Robert L. Chason

R. L. Chason

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY CC
DEPUTY SHERIFF

FILED

JUL 21 1964

ALICE J. DUCK, CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120