

LEONARD T. TRAVIS, : IN THE CIRCUIT COURT OF  
Plaintiff : BALDWIN COUNTY,  
VS. : ALABAMA  
JIM WATERS, JR., and : AT LAW  
ALLEN HAWKINS, separately,  
severally and individually, :  
Defendants : CASE NO. 6144

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA:

COUNT ONE

The Plaintiff claims of the Defendants the sum of TWENTY FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, as damages, for that heretofore, on to-wit; the 5th day of October, 1963, the Defendant, Allen Hawkins, the agent, servant or employee of the Defendant, Jim Waters Jr, while acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle on County Highway 64 at or near its intersection with County Highway 104 in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against a motor vehicle then and there operated by the Plaintiff, and as a proximate result of said negligence the Plaintiff sustained a traumatic compound comminuted fracture of the left arm, he was made sick, sore and lame, he was caused to suffer great physical pain and mental anguish and will continue to suffer great physical pain and mental anguish in the future, he was caused to incur doctor bills, hospital bills, medical bills in and about the treatment of his injuries; the

Plaintiff was caused to lose time and wages from his employment and was permanently injured; the Plaintiff, in the future will be caused as a proximate result of said negligence to incur doctor bills, medical expenses and the Plaintiff's future earning capacity will be greatly reduced, all to his 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) DOLLARS, as damages, for that heretofore, on to-wit; the 5th day of October, 1963, the Defendant, Allen Hawkins, the agent, servant or employee of the Defendant, Jim Waters, Jr., while acting within the line and scope of his authority as such agent, servant or employee, so wantonly operated a motor vehicle on County Highway 64 at or near its intersection with County Highway 104 in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against a motor vehicle then and there operated by the Plaintiff, and as a proximate result of said wantonness the Plaintiff sustained a traumatic compound comminuted fracture of the left arm, he was made sick, sore and lame, he was caused to suffer great physical pain and mental anguish and will continue to suffer great physical pain and mental anguish in the future, he was caused to incur doctor bills, hospital bills, medical bills in and about the treatment of his injuries;

the Plaintiff was caused to lose time and wages from his employment and was permanently injured; the Plaintiff, in the future will be caused as a proximate result of said wantonness to incur doctor bills, medical bills and the Plaintiff's future earning capacity will be greatly reduced, all to his damages, as aforesaid, hence this suit.

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THOMAS M. HAAS  
Attorney for Plaintiff

The Plaintiff demands a jury trial.

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THOMAS M. HAAS

Defendants may be served:

Jim Waters Jr.,  
Loxléy, Alabama

Allen Hawkins  
Five Miles past Spanish Fort off Highway 31, turn left at Church  
Baldwin County, Alabama

FILED

AUG 12 1944

MAILED 1 1944  
CLERK OF COURT  
MOBILE, ALABAMA

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6144

TERM. 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Jim Waters, Jr. & Allen Hawkins

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 Jim Waters, Jr.  
and Allen Hawkins, separately, severally and individually Defendant.

by LEONARD T. TRAVIS  
Plaintiff.

Witness my hand this 12th day of August 1964

Alice D. Duck Clerk

LEONARD T. TRAVIS, : IN THE CIRCUIT COURT OF  
Plaintiff : BALDWIN COUNTY,  
VS. : ALABAMA  
JIM WATERS, JR., and : AT LAW  
ALLEN HAWKINS, separately,  
severally and individually, :  
Defendants : CASE NO. 6144

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA:

COUNT ONE

The Plaintiff claims of the Defendants the sum of TWENTY FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, as damages, for that heretofore, on to-wit; the 5th day of October, 1963, the Defendant, Allen Hawkins, the agent, servant or employee of the Defendant, Jim Waters Jr., while acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle on County Highway 64 at or near its intersection with County Highway 104 in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against a motor vehicle then and there operated by the Plaintiff, and as a proximate result of said negligence the Plaintiff sustained a traumatic compound comminuted fracture of the left arm, he was made sick, sore and lame, he was caused to suffer great physical pain and mental anguish and will continue to suffer great physical pain and mental anguish in the future, he was caused to incur doctor bills, hospital bills, medical bills in and about the treatment of his injuries; the

Plaintiff was caused to lose time and wages from his employment and was permanently injured; the Plaintiff, in the future will be caused as a proximate result of said negligence to incur doctor bills, medical expenses and the Plaintiff's future earning capacity will be greatly reduced, all to his 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) DOLLARS, as damages, for that heretofore, on to-wit; the 5th day of October, 1983, the Defendant, Allen Hawkins, the agent, servant or employee of the Defendant, Jim Waters, Jr., while acting within the line and scope of his authority as such agent, servant or employee, so wantonly operated a motor vehicle on County Highway 64 at or near its intersection with County Highway 104 in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against a motor vehicle then and there operated by the Plaintiff, and as a proximate result of said wantonness the Plaintiff sustained a traumatic compound comminuted fracture of the left arm, he was made sick, sore and lame, he was caused to suffer great physical pain and mental anguish and will continue to suffer great physical pain and mental anguish in the future, he was caused to incur doctor bills, hospital bills, medical bills in and about the treatment of his injuries;

the Plaintiff was caused to lose time and wages from his employment and was permanently injured; the Plaintiff, in the future will be caused as a proximate result of said wantonness to incur doctor bills, medical bills and the Plaintiff's future earning capacity will be greatly reduced, all to his damages, as aforesaid, hence this suit.

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THOMAS M. HAAS  
Attorney for Plaintiff

The Plaintiff demands a jury trial.

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THOMAS M. HAAS

Defendants may be served:

Jim Waters Jr.,  
Loxley, Alabama

Allen Hawkins  
Five Miles past Spanish Fort off Highway 31, turn left at Church  
Baldwin County, Alabama

**FILED**

AUG 12 1964

ALICE J. DUCK, CLERK  
REGISTER

THOMAS M. HAAS  
ATTORNEY AT LAW  
727-28-29 FIRST NATIONAL BANK BUILDING  
HE 2-0457  
MOBILE, ALABAMA

LEONARD T. TRAVIS, : IN THE CIRCUIT COURT OF  
Plaintiff : BALDWIN COUNTY,  
VS. : ALABAMA  
JIM WATERS, JR., and : AT LAW  
ALLEN HAWKINS, separately,  
severally and individually, :  
Defendants : CASE NO. 6144

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA:

COUNT ONE

The Plaintiff claims of the Defendants the sum of TWENTY FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, as damages, for that heretofore, on to-wit; the 5th day of October, 1963, the Defendant, Allen Hawkins, the agent, servant or employee of the Defendant, Jim Waters Jr, while acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle on County Highway 64 at or near its intersection with County Highway 104 in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against a motor vehicle then and there operated by the Plaintiff, and as a proximate result of said negligence the Plaintiff sustained a traumatic compound comminuted fracture of the left arm, he was made sick, sore and lame, he was caused to suffer great physical pain and mental anguish and will continue to suffer great physical pain and mental anguish in the future, he was caused to incur doctor bills, hospital bills, medical bills in and about the treatment of his injuries; the




Plaintiff was caused to lose time and wages from his employment and was permanently injured; the Plaintiff, in the future will be caused as a proximate result of said negligence to incur doctor bills, medical expenses and the Plaintiff's future earning capacity will be greatly reduced, all to his 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) DOLLARS, as damages, for that heretofore, on to-wit; the 5th day of October, 1963, the Defendant, Allen Hawkins, the agent, servant or employee of the Defendant, Jim Waters, Jr., while acting within the line and scope of his authority as such agent, servant or employee, so wantonly operated a motor vehicle on County Highway 64 at or near its intersection with County Highway 104 in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against a motor vehicle then and there operated by the Plaintiff, and as a proximate result of said wantonness the Plaintiff sustained a traumatic compound comminuted fracture of the left arm, he was made sick, sore and lame, he was caused to suffer great physical pain and mental anguish and will continue to suffer great physical pain and mental anguish in the future, he was caused to incur doctor bills, hospital bills, medical bills in and about the treatment of his injuries;

the Plaintiff was caused to lose time and wages from his employment and was permanently injured; the Plaintiff, in the future will be caused as a proximate result of said wantonness to incur doctor bills, medical bills and the Plaintiff's future earning capacity will be greatly reduced, all to his damages, as aforesaid, hence this suit..

  
THOMAS M. HAAS  
Attorney for Plaintiff

The Plaintiff demands a jury trial.

  
THOMAS M. HAAS

Defendants may be served:

Jim Waters Jr.,  
Loxley, Alabama

Allen Hawkins  
Five Miles past Spanish Fort off Highway 31 turn left at Church.  
Baldwin County, Alabama

FILED

AUG 12 1964

AUG 12 1964  
CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6144

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Jim Waters, Jr. & Allen Hawkins

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 Jim Waters, Jr.  
and Allen Hawkins, separately, severally and individually, Defendant.....

by LEONARD T. TRAVIS

Plaintiff.....

Witness my hand this 12th day of August 19 64

*N.F.*

*Alice J. Duck* Clerk

No. 6144

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LEONARD T. TRAVIS

Plaintiffs

vs.

JIM WATERS, JR. & ALLEN HAWKINS,

Separately, severally and individually  
Defendants

SUMMONS AND COMPLAINT

Filed August 12, 1964

Alice J. Duck

Clerk

Thomas M. Haas

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Aug 12 1964

Taylor Wilkins Sheriff

I have executed this summons

this 19

by leaving a copy with

Jim Waters Jr.  
Allen Hawkins  
5 mi. past  
Fulton  
31

Returned 5 day of Sept 1964

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By W. C. Garner  
Deputy Sheriff

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA  
BALDWIN COUNTY

No. 6144

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Jim Waters, Jr. & Allen Hawkins

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 Jim Waters, Jr. and Allen Hawkins, separately, severally and individually....., Defendant.....

by LEONARD T. TRAVIS.....

..... Plaintiff.....

Witness my hand this 12th day of August 1964..

Alice D. Suck, Clerk