

BARBARA B. HIPSH, : IN THE CIRCUIT COURT OF
Defendant. :
VS: : BALDWIN COUNTY, ALABAMA
: AT LAW
JOHN FREGO, SR., :
Defendant. : CASE NO. 6 2 1 5

Comes now the Defendant in the above styled matter
and for answer to the complaint heretofore filed says as
follows:

1. Not guilty.

COLLINS, GALLOWAY & MURPHY

By: Thomas M. Galloway
Attorneys for Defendant

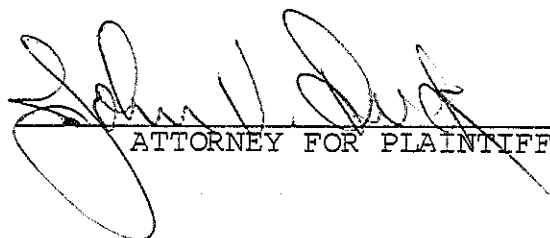
FILED
DEC 19-64
AME L. DICK, CLERK
REGISTER

BARBARA B. HIPSH,)
 Plaintiff,)
vs.)
JOHN FREGO, SR.)
 Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. 6215

Comes now the Plaintiff in the above styled cause, and
moves the Court for a continuance and for grounds therefor says:

That the Defendant, JOHN FREGO, SR. died and that his
estate has not been opened as of this date.


ATTORNEY FOR PLAINTIFF

FILED
MAY 28 1964
BALDWIN COUNTY
ALABAMA

BARBARA B. HIPSH

Plaintiff

-VS-

JOHN FREGO SR.

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW. 6215

)

COUNT ONE:

The Plaintiff claims of the Defendant the sum of TWENTY-FIVE THOUSAND DOLLARS, (\$25,000.00), as damages, for that, heretofore, on, to-wit,: the 22nd day of November, 1963, the Plaintiff was operating a motor vehicle on, viz, Section Street, Fairhope, Baldwin County, Alabama, at its inter-section of White Avenue, in Fairhope, Baldwin County, Alabama, being then and there a public highway in Baldwin County, Alabama, where she had a right to be, and the Defendant, so negligently operated a motor vehicle then and there, as to cause or allow his said motor vehicle to run into, upon or against the automobile in which the Plaintiff was then and there operating; and Plaintiff avers that as a proximate consequence thereof, she was injured in that she suffered a fracture of her neck, that she suffered multiple ligamentous tears of the cervical spine, that she suffered multiple contusions and abrasions, that she was permanently injured, that she was compelled to go to a hospital; employ doctors at great expense, which said employment now continues as to treatment by said doctors in which expenses continues in an amount not yet known by Plaintiff; and Plaintiff further alleges that her capacity for work has been greatly reduced, that such condition continues to exist and will so continue to exist for an indeterminate period of time; that she had suffered great physical pain and mental anguish and will continue to suffer great physical pain and mental anguish, that she was permanently injured; for all of which she claims damages as aforesaid, hence this suit.

Plaintiff respectfully demands
a trial by Jury.

Attorney for Plaintiff

Attorney for Plaintiff

FILED

SEP 20 1964

Deft. may be served
at Rt. 2 Box 117
Fairhope, Alabama

194

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOHN FREGO SR.

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.....
John Frego Sr......, Defendant.....

by
BARBARA B. HIPSH..... Plaintiff.....

Witness my hand this 31 day of Sept. 1964
Elise D. Duck Clerk

62-10-5-64

No. 6215

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

BARBARA B. HTPSH

Plaintiffs

vs.

JOHN FREGO SR.

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

SEP 30 1964

Clerk

ALICE J. DUCK, CLERK
REGISTER

John V. Duck
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt. 2, Box 117

Fairhope, Alabama

Received In Office

10/1 19 64
Taylor Wilkins Sheriff

I have executed this summons

this Oct 5 1964

by leaving a copy with

John Frego Sr.

70
7 00
RP
Deputy Sheriff

Taylor Wilkins Sheriff
Roy Randall Deputy Sheriff