

LOIS HALL,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS)	AT LAW
Roland D. Sullivan,)	CASE NO. 6373
Defendant.)	

MOTION FOR DEFAULT JUDGMENT

COMES NOW THE PLAINTIFF in above styled cause, by her attorney, and moves that this Honorable Court to enter a Judgment by Default in above-styled cause, because of the failure of the Defendant to file an answer, demurrer or an appearance within thirty days from the date of service of the Summons and Complaint upon the defendant, said service having been by personal service upon the defendant on February 2, 1965. Your Plaintiff further request that this Honorable Court grant permission for Plaintiff to submit to the Court at a later date, testimony as to the amount of damages she is entitled to.

Kenneth Cooper
 Attorney for Plaintiff

FILED
 MAR 31 1965
 ALICE J. DUCK, CLERK
 REGISTER

LOIS HALL	:	IN THE CIRCUIT COURT OF
Plaintiff	:	BALDWIN COUNTY, ALABAMA
vs	:	
ROLAND D. SULLIVAN	:	AT LAW
Defendant	:	CASE NO. <u>6373</u>

COUNT 1

The plaintiff as mother of Richard E. Hall, a minor, claims of the defendant the sum of One Hundred Thousand and No/100 (\$100,000.00) Dollars, as damages for this: That on to wit the 3 day of July, 1964, while the plaintiff's said minor child was operating a motor vehicle in an eastwardly direction on United States Highway 98, at a point approximately four and four tenths (4.4) miles west of Magnolia Springs, Alabama, which said highway is a public way in Baldwin County, State of Alabama, the defendant so negligently operated a motor vehicle in a westwardly direction on the aforesaid highway at the aforesaid time and place as to cause or allow the same to run onto, into or against or to come into collision with the motor vehicle being then and there operated by the plaintiff's said minor child, and the defendant did then and there negligently injure the said minor child, and as a direct and proximate consequence of the said injury the said minor child was caused to die and the motor vehicle being then and there operated by the plaintiff's said minor child was wholly destroyed; wherefore the plaintiff claims of the defendant the sum of \$100,000.00.

COUNT 2

The plaintiff as mother of Richard E. Hall, a minor, claims of the defendant the sum of One Hundred Thousand and No/100 (\$100,000.00) Dollars, as damages for this: That on to wit the 3 day of July, 1964, while the plaintiff's said minor child was operating a motor vehicle in an eastwardly direction on United States Highway 98, at a point approximately four and four tenths (4.4) miles west of Magnolia Springs, Alabama, which said highway is a public way in Baldwin County, State of Alabama, the defendant so wantonly and wilfully operated a motor vehicle in a westwardly direction on the aforesaid highway at the aforesaid time and place as to cause or allow the same to run onto, into or against or to come into collision with the motor vehicle being then and there operated by the plaintiff's said minor child, and the defendant did then and there wantonly and wilfully

injure the said minor child, and as a direct and proximate consequences of the said injury the said minor child was caused to die and the motor vehicle being then and there operated by the plaintiff's said minor child was wholly destroyed; wherefore the plaintiff claims of the defendant the sum of \$100,000.00.

Paul W. Brunson
Paul W. Brunson, attorney for plaintiff
64 S. Lafayette Street, Mobile, Alabama

The plaintiff respectfully demands a trial by jury.

Paul W. Brunson

Address of defendant:

210 Fig Street, Fairhope, Ala.

FILED

JAN 28 1965

WILLIAM CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6373

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Roland D. Sullivan

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.....

Roland D. Sullivan

....., Defendant.....

by Lois Hall

....., Plaintiff.....

Witness my hand this.....28.....day of.....January.....19 65

EX-2-2-65

352

Alvin J. Neuch Clerk

No. 6373

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LOIS HALL

Plaintiffs

vs.

ROLAND D. SULLIVAN

Defendants

SUMMONS AND COMPLAINT

Filed 1-28- 19 65

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received In Office

JAN 28 1965 19.....

TAYLOR WILKINS Sheriff

SHERIFF

I have executed this summons

this 2-2- 1965

by leaving a copy with

Roland D. Sullivan

Bay Minette Jail

Sheriff

Roy Randall Deputy Sheriff