

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 VICKI A. WHITEHURST, a minor, and  
WINNIE J. WHITEHURST, jointly and individually,

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 VICKI A.  
WHITEHURST, a minor, and WINNIE J. WHITEHURST, jointly & individually,  
Defendant.s.

by ALEXANDER P. WALDROP

..... Plaintiff.....

Witness my hand this 4 day of Feb 1965  
Alexander P. Waldrop, Clerk

No. .... Page .....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ALEXANDER P. WALDROP

Plaintiffs

vs.

VICKI A. WHITEHURST, a minor,  
and WINNIE J. WHITEHURST,  
jointly and individually,

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

207 Fairhope Avenue  
Fairhope, Alabama

Received In Office

19...

Sheriff

I have executed this summons

19.....

this .....  
by leaving a copy with

Sheriff

Deputy Sheriff

No..... Page.....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

ALEXANDER P. WALDROP

Plaintiffs

vs.

VICKI A. WHITEHURST, a minor,  
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..... Sheriff

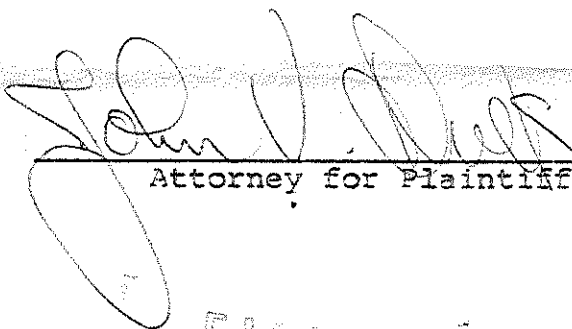
..... Deputy Sheriff

ALEXANDER P. WALDROP,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
VICKI A. WHITEHURST, a	)	
minor, and WINNIE J.	)	
WHITEHURST, jointly and	)	
individually,	)	
Defendants.	)	

Plaintiff claims of the Defendant TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) DOLLARS as damages, for that heretofore on, to-wit: the 19th day of September, 1964, at 7:40 P. M., Plaintiff was operating his automobile at the intersection of Church Street and Magnolia Avenue in Fairhope, Alabama, which was then and there a public street in Fairhope, County of Baldwin, Alabama, and then and there, VICKI A. WHITEHURST, the agent, servant or employee of the Defendant, WINNIE J. WHITEHURST, while acting within the line and scope of her authority, so negligently operated a motor vehicle as to run into, upon or against the vehicle in which Plaintiff and Plaintiff's said wife, PAULETTA WALDROP, were riding, and by reason thereof, and as a proximate result and consequence thereof, Plaintiff's said wife received severe personal injuries in this, to-wit: She received contusions, abrasions and lacerations, her teeth were knocked out, she was caused to be confined to the hospital, she received a severe injury to her neck, she suffered and continues to suffer a mental anguish and physical pain. She was permanently injured.

Plaintiff avers that as the proximate result and consequence of the injuries to his wife, the Plaintiff was caused to incur considerable expense for medical, surgical and hospital treatment, the taking of X-rays, nurses, doctors, etc. in and about the treatment of his said wife, and will probably will have to incur further expenses in the future, and Plaintiff lost and continues to lose the society, consortium and services of his said wife; for all of which he claims damages.

Plaintiff further avers that due to the negligence of the Defendant as aforesaid, and as a proximate consequence thereof, Plaintiff's automobile was damaged and demolished, all to his great damage as aforesaid; hence this suit.

  
Attorney for Plaintiff

The Defendants may be served  
at 207 Fairhope Avenue,  
Fairhope, Alabama

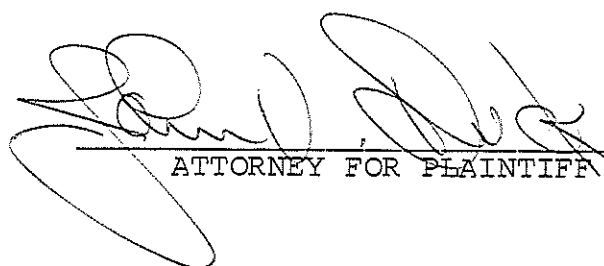
FILED

ALICE L. DUCK, CLERK  
REGISTER

ALEXANDER P. WALDROP,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW CASE NO. 6388
VICKI A. WHITEHURST, a	)	
minor, and WINNIE J.	)	
WHITEHURST, jointly and	)	
individually,	)	
Defendants.	)	

Comes the Plaintiff in the above styled cause, and propounds the following Interrogatories to WILLIE J. WHITEHURST, Defendant:

1. State your full name and address.
2. State your occupation.
3. Do you have a daughter by the name of VICKI A. WHITEHURST?
4. If your answer to the next preceding question is YES, what was her age on the 19th day of September, 1964?
5. In whose name was the automobile registered that your daughter, VICKI A. WHITEHURST, was operating at the intersection of Church Street and Magnolia in Fairhope, Alabama on the 19th day of September, 1964?
6. What is the present mailing address of VICKI V. WHITEHURST?
7. If the above question was answered that the automobile was registered in your name, did VICKI A. WHITEHURST have permission from you to use the said automobile on the 19th day of September, 1964?
8. Is VICKI A. WHITEHURST employed?
9. If your answer to the next preceding question was YES, please give the name and mailing address of her present employer.

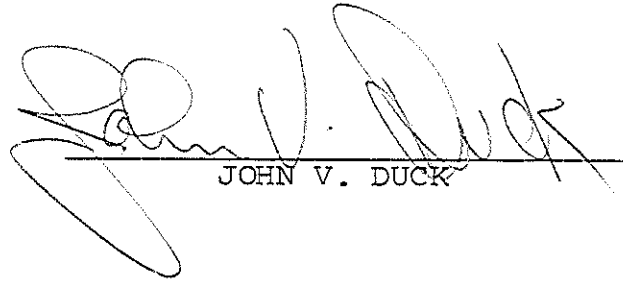
  
 ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA

BALDWIN COUNTY

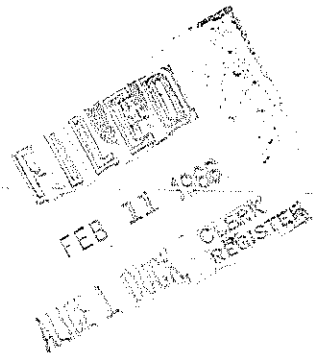
Before me, the undersigned authority, in and for said state and county, personally appeared JOHN V. DUCK, who being by me first duly sworn, deposes and says:

My name is JOHN V. DUCK and I am the ATTORNEY OF RECORD FOR THE PLAINTIFF in the above entitled cause, and as such I am authorized to make this Affidavit. I further state that the Answer of Defendant, WINNIE J. WHITEHURST, to the foregoing Interrogatories will, if truthfully made, be material evidence for the Plaintiff on the trial of said cause.

  
JOHN V. DUCK

Subscribed and sworn to before  
me by the said JOHN V. DUCK on  
this 10th day of February, 1966.

  
NOTARY PUBLIC



No. 6388

Received 11 day of Feb. 1966

and on 15 day of Feb. 1966

I served a copy of the within inter-

on Ernest M. Bailey

By service on same

TAYLOR WILKINS, Sheriff

By Ray Randall D. S.

Shige

Alexander P. Waldrop,

VS

Dickie Whitcomb &  
Winnie J. Whitcomb

Interrogatories

as he served on:  
Ernest M. Bailey

John V. Welch  
Sol. for Plff.



ALEXANDER P. WALDROP,

Plaintiff,

-vs-

VICKI A. WHITEHURST, a  
minor, and WINNIE J.  
WHITEHURST, jointly and  
individually,

Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

ANSWER

Comes now the Defendant, Winnie J. Whitehurst, and for  
answer to the Bill of Complaint filed in this cause says: Not  
guilty, and demands strict proof thereof.

*Ernest M. Bailey*  
Ernest M. Bailey, Attorney for said  
Defendant

For the trial of this cause,  
Defendant demands a jury.

*Ernest M. Bailey*

FILED  
MAR 29 1965  
ALICE A. DUCK, CLERK  
REGISTER

63 88

ALEXANDER P. WALDROP,

Plaintiff

-vs-

VICKI A. WHITEHURST, a  
minor, and WINNIE J  
WHITEHURST, jointly and  
individually,

Defendants

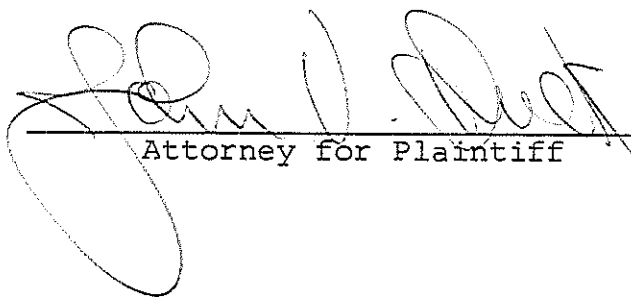
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

ALEXANDER P. WALDROP,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
VICKI A. WHITEHURST, a	)	<i>No. 6385</i>
minor, and WINNIE J.	)	
WHITEHURST, jointly and	)	
individually,	)	
Defendants.	)	

Plaintiff claims of the Defendant TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) DOLLARS as damages, for that heretofore on, to-wit: the 19th day of September, 1964, at 7:40 P. M., Plaintiff was operating his automobile at the intersection of Church Street and Magnolia Avenue in Fairhope, Alabama, which was then and there a public street in Fairhope, County of Baldwin, Alabama, and then and there, VICKI A. WHITEHURST, the agent, servant or employee of the Defendant, WINNIE J. WHITEHURST, while acting within the line and scope of her authority, so negligently operated a motor vehicle as to run into, upon or against the vehicle in which Plaintiff and Plaintiff's said wife, PAULETTA WALDROP, were riding, and by reason thereof, and as a proximate result and consequence thereof, Plaintiff's said wife received severe personal injuries in this, to-wit: She received contusions, abrasions and lacerations, her teeth were knocked out, she was caused to be confined to the hospital, she received a severe injury to her neck, she suffered and continues to suffer a mental anguish and physical pain. She was permanently injured.

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Plaintiff further avers that due to the negligence of the Defendant as aforesaid, and as a proximate consequence thereof, Plaintiff's automobile was damaged and demolished, all to his great damage as aforesaid; hence this suit.

  
\_\_\_\_\_  
Attorney for Plaintiff

The Defendants may be served  
at 207 Fairhope Avenue,  
Fairhope, Alabama

FILED  
FEB 9 1965  
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.....

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in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....VICKI A.  
WHITEHURST, a minor, and WINNIE J. WHITEHURST, jointly & individually,  
.....Defendant.s.

by ALEXANDER P. WALDROP  
....., Plaintiff.....

Witness my hand this.....9.....day of.....Feb.....1965  
N.F. Vicki A. Whitehurst.....Henry French.....Clerk

EX - 2-26-65

No. 6388

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ALEXANDER P. WALDROP

Plaintiffs

vs.

VICKI A. WHITEHURST, a minor,  
and WINNIE J. WHITEHURST,  
jointly and individually,

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

Feb

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

207 Fairhope Avenue  
Fairhope, Alabama

Received In Office

FEB 9 1965

23

19.....

TAYLOR WILKINS  
SHERIFF

Sheriff

I have executed this summons

this 2/26/..... 1965

by leaving a copy with

Winnie J. Whitehurst  
30 Aug. 65

Returned 12 day of Feb 1965

Not found in my county after diligent search and in-

quiry, Vicki A. Whitehurst

In. by Taylor Wilkins Sheriff

by Roy Randall

Deputy Sheriff

Sheriff claims 80 miles at

Ten Cents per mile Total \$8.00

TAYLOR WILKINS, Sheriff

BY Roy Randall

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff

Paint Clear  
Grand Hotel