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STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bobby Holcomb 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 same, then and there to answer the Complaint of Betty Sue Sauls.

Witness my hand this 12 day of legust, 1965.

Oliver Clerk

BETTY SUE SAULS,	X
Plaintiff,	X IN THE CIRCUIT COURT OF
vs.	(BALDWIN COUNTY, ALABAMA
BOBBY HOLCOMB,	X AT LAW
Defendant.	x 6635

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Ten Thousand Dollars (\$10,000.00), as damages, for that, heretofore, on to-wit: July 16, 1965, at a point five miles East of Spanish Fort, Alabama, on U. S. Highway 90, in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause the motor vehicle in which the Plaintiff was riding to leave the highway and overturn, and as a proximate result of such negligence the Plaintiff was injured in that she received severe injuries to her pelvis; she has been caused to suffer physical pain and mental anguish and will continue to suffer physical pain and

mental anguish in the future; the Plaintiff was hospitalized as a result of her said injuries and has been caused to spend large sums of money for hospital and medical expenses; the automobile owned by the Plaintiff and being driven by her at the time was totally destroyed; for all of which the Plaintiff claims damages as aforesaid.

The Plaintiff avers that all of said injuries and damages came as a proximate consequence of said negligence of the Defendant.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Ten Thousand Dollars (\$10,000.00), as damages, for that, heretofore, on to-wit: July 16, 1965, at a point five miles East of Spanish Fort, Alabama, on U. S. Highway 90, in Baldwin County, Alabama, the Defendant so wilfully and wantonly operated a motor vehicle as to cause the motor vehicle in which the Plaintiff was riding to leave the highway and overturn, thereby wilfully and wantonly injuring the Plaintiff in that she received severe injuries to her pelvis; she has been caused to suffer much physical pain and mental anguish and will continue to suffer physical pain and mental anguish in the future; the Plaintiff was hospitalized as a result of her said injuries and has been caused to spend large sums of money for hospital and medical expenses; the automobile owned by the Plaintiff and being driven by her at the time was totally destroyed; for all of which the Plaintiff claims damages as aforesaid.

The Plaintiff avers that all of said injuries and damages came as a proximate consequence of said wilfullness and wantonness of the Defendant, and that he wilfully and wantonly

injured her as aforesaid.

CHASON, STONE & CHASON

By: Attorneys for Plaintiff

Plaintiff demands a trial of this cause by jury.

CHASON, STONE & CHASON

By: Carle Classes Attorneys for Plaintiff

By service on

TAYLOR WILKIPS, Sheriff
By W. D. Saurel D. S.

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Sheriff claims 40 miles at Den Cents per mile Total & 4. A TAYLOR WILKINS, Sheriff BY W. O. Bano DEPUTY SHERIFF

6635 BV

BETTY SUE SAULS, Plaintiff,

Vs.

BOBBY HOLCOMB, Defendant.

201/29

SUMMONS AND COMPLAINT

AUG 12 1965

ALCE & DUCK, CLERK REGISTER

CHASON, STONE & CHASON

MONTHLY STATEMENT

CURTIS A. SMITH. M.D.

1729 SPRINGHILL AVENUE STORE AND SA

Mrs. Betty Sue Sauls 1551 S. Washington Ave. Mobile, Elabama

DATE	DESCRIPTION	CHARGES	CREDITS	BALANCE
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