

CLARA BURNETT,
PLAINTIFF
vs
IRMAL R. HARRIS,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6405

1.

The Plaintiff, Clara Burnett, claims of the Defendant the sum of TEN THOUSAND AND NO/100 DOLLARS (\$10,000.00) as damages for that heretofore on, to-wit, the 25th day of July, 1964, Clara Burnett was riding in the vehicle which was being driven in an easterly direction along or upon Fairhope Avenue, a public street in Fairhope, Baldwin County, Alabama, at a point where Fairhope Avenue intersects Greeno Road; that at said time and place, the Defendant, Irmal R. Harris, who was driving an automobile in a northerly direction on Greeno Road, a public road in Fairhope, Baldwin County, Alabama, who so negligently operated her automobile as to cause it to run into and against the automobile in which Clara Burnett was riding and by reason thereof and as a proximate result and consequence of said negligence, Clara Burnett was injured as follows, to-wit: She received whiplash injuries to her neck and back, she received lacerations of the scalp, multiple abrasions and contusions of the body, her left knee was injured, her right shoulder and lower back was injured, she suffered multiple ligamentous strains, she was caused to suffer much mental and physical anguish and pain, and was caused to spend large sums of money for hospitalization and medication in the treatment of her injuries, and she was permanently injured, all to the loss of the Plaintiff in the aforesaid amount.

2.

The Plaintiff claims of the Defendant, the sum of TEN THOUSAND AND NO/100 DOLLARS (\$10,000.00) as damages, for that heretofore on, to-wit, the 25th day of July, 1964, Clara Burnett was riding in a vehicle which was being driven along or upon Fairhope Avenue, a public street in Fairhope, Baldwin County, Alabama, at a point where Fairhope Avenue intersects Greeno Road; that at said time and place, the Defendant, Irmal R. Harris, so negligently operated the vehicle she was riding so as to cause it to collide

with the vehicle in which Clara Burnett was riding and by reason thereof and as a proximate result of said negligence, Clara Burnett was injured as follows: She received whiplash injuries to her neck and back, she received lacerations of the scalp, multiple abrasions and contusions of the body, her left knee was injured, her right shoulder and lower back was injured, she suffered multiple ligamentous strains, she was caused to suffer much pain and discomfort as a result of said negligence, and she is permanently injured, all to the loss of the Plaintiff in the aforesaid amount.

3.

The Plaintiff, claims of the Defendant the sum of TEN THOUSAND AND NO/100 DOLLARS (\$10,000.00) as damages for that heretofore on, to-wit, July 25, 1964, the Plaintiff was riding in an automobile being operated in an easterly direction along and upon Fairhope Avenue, a public street in Fairhope, Baldwin County, Alabama, where Fairhope Avenue intersects Greeno Road; that at said time and place, the Defendant, Irmal R. Harris, who was driving an automobile in a northerly direction on Greeno Road, a public road in Fairhope, Baldwin County, Alabama, so wantonly operated her automobile as to cause it to wantonly run into and against the automobile Clara Burnett was riding in; and ^{as} a direct proximate consequence and result of said wanton act, Clara Burnett was wantonly injured as follows: She received whiplash injuries to her neck and back, she received lacerations of the scalp, multiple abrasions and contusions of the body, her left knee was injured, her right shoulder and lower back was injured, she suffered multiple ligamentous strains, she was caused to suffer much pain and discomfort as a result of said wanton act, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS, BRANTLEY & NESBIT

By: Phyllis S. Nesbit

Attorney for Plaintiff

Plaintiff demands a trial by Jury.

Phyllis S. Nesbit

WILTERS, BRANTLEY & NESBIT

FILED

FEB 18 1965

129

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

IRMAL R. HARRIS

-

Foley, Alabama

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 _____

IRMAL R. HARRIS

Defendant_____

by _____

CLARA BURNETT

Plaintiff_____

Witness my hand this _____

day of _____

1965

EX-2-20-65

Arce J. Leach, Clerk

No.

7206405

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

CLARA BURNETT

Plaintiffs

vs.

IRMAL R. HARRIS

Defendants

Summons and Complaint

Filed

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Clerk

FEB 19 1965

ALICE L. DUCK, CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

FEB 18 1965

19

TAYLOR WILKINS
SHERIFF

Sheriff.

I have executed this summons

this

20th Feb

19

65

by leaving a copy with

Irmal R. Harris

Sheriff's Claims

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.

○

○

vs.

Y

IRMAL R. HARRIS,

AT LAW

NO.

○

131

6405

CLARA BURNETT,
Plaintiff,

vs

IRMAL R. HARRIS,
Defendant.

DEMURRER
