

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon First National Bank of Bay Minette, a National Banking Association, 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 the same, then and there to answer the complaint of Tillie B. Good.

WITNESS my hand this 16 day of April, 1965.

Alice J. Duck
Clerk

* * * * *

TILLIE B. GOOD,
Plaintiff,

VS.

FIRST NATIONAL BANK OF BAY
MINETTE, a National Banking
Association,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

6475

COMPLAINT

The plaintiff claims of the defendant the sum of Fifteen Thousand Dollars (\$15,000.00) for that heretofore on to-wit, May 11, 1964, the defendant operated a banking business in the City of Bay Minette in a building situated on the West side of Hand Avenue, approximately one block South of the Courthouse, at which time and place the entrance to the said banking business on the East side thereof consisted of two glass doors with a clear glass handle on either side, approximately eight feet high and four feet wide; that the said defendant was in the process of remodeling the said building and the plaintiff had not entered the interior of the premises since the said glass doors and panels had been installed; that the entire arrangement gave the plaintiff an illusion of space which was so successful as to cause the plaintiff to mistake the illusion for reality and as a result thereof, plaintiff walked into and broke


one of the glass panels aforesaid, causing her to be injured and damaged as follows: her leg was severely cut; several of her teeth were knocked out; she was bruised and cut to such an extent that she was hospitalized for a long period of time, causing her to spend much money in and about the treatment of her injuries for hospital, medicine and doctor bills; she was permanently injured and made sick, sore and nervous, all as a result of her said injuries aforesaid. Plaintiff avers that all of her said injuries and damages were the proximate result of the negligence of the defendant in that the said defendant failed to notify or warn the said plaintiff of the presence of said glass panels, although they knew, or should have known, that the said plaintiff was likely to injure herself in the manner in which the plaintiff did injure herself; that the said defendant negligently failed to place any stripping or other warning sign on the said glass doors or panels, which is customary under the same or similar circumstances, hence this suit.

FILED

APR 16 1965

ALICE J. DUCK, CLERK
REGISTER

64-4-21-65


Attorney for Plaintiff

CASE NO. 6475

TILLIE B. GOOD,

Plaintiff

vs:

FIRST NATIONAL BANK OF
BAY MINETTE, A National
Banking Association,

Defendant.

received 16 day of April 1945
and on 21 day of April 1945
I served a copy of the within etc
in Tillie B. Good
First National Bank
By service on Mr. Maurin Kelly
V-Pres.
TAYLOR WILKINS, Sheriff
By W. A. Talbot D.
omr

FILED

APR 16 1945

ALICE J. DUCK, CLERK
REGISTER

James R. Owen, Atty.