

STATE OF ALABAMA

X CIRCUIT COURT

BALDWIN COUNTY

X

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons Stuckey's Lumber Company of Bay Minette, Alabama, to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur within thirty days from service hereof to the Complaint of Frazier L. Watts.

Witness my hand this 22 day of April, 1965.

[Signature]
CLERK.

* * * * *
C O M P L A I N T.

FRAZIER L. WATTS,
PLAINTIFF.

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA.

VS:

X

LAW SIDE.

STUCKEY'S LUMBER COMPANY,
DEFENDANT.

X

NO. 6478

Your petitioner files this his complaint under the Workmen's Compensation Statutes of the State of Alabama, against Stuckey's Lumber Company and respectfully shows unto the Court as follows:

1. Your Petitioner, Frazier L. Watts, shows unto the Court that he is 45 years of age, a resident of Atmore, Escambia County, Alabama, and that the Defendant is qualified to do business in the State of Alabama, and was doing business at Bay Minette, Alabama, on to-wit, May 8, 1964.

2. That on, to-wit, May 8, 1964, petitioner was employed by said Defendant in Baldwin County, Alabama, and that while so employed by said Defendant your Petitioner was injured when a strip of log kicked back from the feeder and struck him in the left inguinal area and as a proximate result thereof he suffered severe pain, injury and complications and has been permanently disabled and petitioner avers that his injuries arose out of and in the cause of his employment.

3. That at the time of said accident your Petitioner and his said employer were subject to the provisions of the Workmen's Compensation act of Alabama.

4. Your petitioner further avers that the Defendant had actual knowledge of the accident at the time of the occurrence.

5. Your petitioner further avers that at the time of the accident he had a wife and three children wholly dependent upon him and that his average wages at the time of his injury was at the rate of \$47.50 per week.

6. A controversy has now arisen between your Petitioner and the Defendant as to the extent of his disability and the number of weeks of Compensation which should be paid thereof.

The premises considered, your Petitioner shows unto the Court that he is entitled to receive from the Defendant the Compensation provided by the Statutes of the State of Alabama covering such cases and he prays that said Stuckey's Lumber Company be made party Defendant to this his complaint; that the Court will make an order fixing the time and place for the hearing of this complaint and that the Defendant be required to sign a verified answer thereto setting up the facts, if any, upon which they rely in defense hereof; and the Petitioner prays that on the hearing of this petition and complaint a judgment or decree be entered granting to him such compensation as he may be entitled to receive.

470229 W alls
PETITIONER

FILED

4-22 1965

ALICE L. DICKINSON
CLERK

STATE OF ALABAMA X

ESCAMBIA COUNTY X

Before me, Mary B. Jennings, a Notary Public in and for said State and County, personally appeared Frazier L. Watts, who being known to me, stated under oath, that the facts and things alleged in the foregoing Petition are true and correct according to his best information, knowledge and belief.

Frazier Watts

Sworn to and subscribed before me, this 21st day of April, 1965.

Mary B. Jennings
Notary Public.

My Commission Expires Nov. 1, 1965

E4-426-65

MO. 64-78

Frazier L. Watts,
Plaintiff

vs.

Stuckey Lumber Co.
Defendants.

Received 22 day of April 1965
and on 24 day of April 1965
I served a copy of the within 3 TC
on Stuckey Lumber Co.

By service on Reaper & Carter

TAYLOR WILKINS Sheriff
By W A DeLoach S.
4 miles north of 1014

FILED
APR 22 1965
AUG. L. DUK, CLERK
REGISTER

Sheriff claims 3 miles at
Ten Cents per mile Total \$ 80
BY W A DeLoach Sheriff
DEPUTY SHERIFF

ATTORNEYS AT LAW

TUCKER & HILDRETH

504 east nashville avenue · atmore, alabama · telephone 368-3199

J. R. TUCKER
EMMETT F. HILDRETH

April 21, 1965

Mrs. Alice J. Duck
Circuit Clerk
Baldwin County
Bay Minette, Alabama

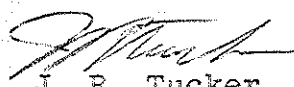
Re: Frazier L. Watts
Vs: Stuckey's Lumber Co.

Dear Mrs. Duck:

I am enclosing herewith original and copy of Complaint and Summons which we desire filed in the Circuit Court in regard to the above mentioned case.

Yours very truly,

TUCKER & HILDRETH


J. R. Tucker

JRT/mbj

Encl.