SYBIL S. BEASLEY, IN THE CIRCUIT COURT OF Plaintiff, ) BALDWIN COUNTY, ALABAMA VS. AT LAW JOHN CARLTON KENDRICK, Defendant. )

## COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE THOU-SAND AND NO/100 (\$5,000.00) DOLLARS as damages, for that, heretofore and on, to-wit: the 26th day of September, 1964, the Plaintiff was riding in an automobile on Highway Alabama No. 87, at a point thereon five (5) miles north of its intersection with U.S. Highway No. 90, which was then and there a public highway in Baldwin County, Alabama, and then and there the Defendant so negligently operated a motor wehicle as to run into, upon or against the automobile in which Plaintiff was riding, and thereby and as a proximate result and consequence thereof, the Plaintiff was injured in that she suffered a fracture of the transverse process of the second lumbar vertrbra, she suffered multiple contusions and abrasions, she suffered mutliple muscle injuries in and about her back, she was made otherwise sick, sore and lame; she was permanently injured; she was caused to expend considerable sums for medical treatment, hospital care, nursing and medicines in and about the treatment of her injuries, for all of which she claims damages as aforesaid.

ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands a

Trial by Jury.

ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA  BALDWIN COUNTY  Circuit Court, Baldwin County  NoTERM, 1	9
TO ANY SHERIFF OF THE STATE OF ALABAMA:	× •••••••
You Are Hereby Commanded to Summon JOHN CARLTON KENDRICK	74
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to appear and plead, answer or demur, within thirty days from the service hereof, to the complain in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against	
JOHN CARLTON KENDRICK Defenda	nt
Witness my hand this 6 day of 19.69	
CI- The letter thence	Clark

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No. 6364 Page	Defendant lives at
STATE OF ALABAMA  Baldwin County	can be served at S & H Concrete Co. in Foley, Ala. or at his home in Stapleton, Ala.  Received in Office
CIRCUIT COURT	
SYBIL S. BEASLEY	JUL 6 1965 19
Plaintiffs  vs.  JOHN CARLTON KENDRICK	TAYLOR WILKING Sheriff  HERITE Sheriff  I have executed this summons  this Lala 19 5  by leaving a copy with  John Carlton Kondrick
Defendants	
SUMMONS AND COMPLAINT	
Filed	
Clerk	18 inlies at
	Sheriff claims  Sheriff claims  Ten Conts per mile Total \$ 7 mile  Ten Conts per
	BY CM GOOTY SHIPPING
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JOHN V. DUCK	101,116
Plaintiff's Attorney	Taylor Willson's Sheriff
Defendant's Attorney	m Easthin Deputy Sheriff
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SYBIL S. BEASLEY,

Plaintiff,

VS.

ALABAMA. AT LAW.

JOHN CARLTON KENDRIVK,

Defendant.

Defendant.

October 17, 1966

## SYBIL S. BEASLEY, BEING FIRST DULY SWORN, TESTIFIED: Examination by Mr. Duck.

- Q. Your are Mrs. Sybil S. Beasley?
- A. Yes sir.
- Q. Were you in the automobile with your husband when it was involved in an accident here in Baldwin County, Alabama, on the 26th day of September, 1964?
- A. Yes sir, I was.
- Q. Did you suffer injuries as a result of that accident Mrs. Beasley?
- A. I did; I suffered a fracture of the transverse process
- of the second lumbar vertrbra, also a bad blow to the left kidney, causing a deep bruise and blood clot to the kidney and some other minor bruises.
- Q. Did you get a whip-lash injury to your neck?
- . It seems to have cleared up, but I did have a neck problem.
- Q. Did you incur hospital and nursing bills and Doctor bills as a result of the accident?
- A. I did.
- Q. What was that?
- A. I was hospitalized for eight days and had medical care for eight days and I was dismissed from the hospital and told that I could return to work when I felt able to move; that help movement would/me, and I was off about a week after I got

hom and I then returned to my job.

- Q. What was the total amount of your hospital and Doctor bills as a result of this accident?
- A. Between \$350.00 and \$400.00, the best I remember; I have the records and the insurance company has records.
- Q. And you lost better than two weeks from your job?
- A. Yes sir.
- Q. Where are you employed?
- A. Blaum's as Secretary.
- Q. What is your income per week?
- A. \$80.00.
- Q. Did you suffer much pain as a result of this accident?
- A. Yes sir; there was a number of months before I could walk well and I still have some soreness and pain at the location of the fracture; most of the time I feel quite well.
- Q. You can walk and work now?
- A. Yes sir.

## CERTIFICAT E:

I hereby certify that the foregoing is a true and correct transcript of the testimony as taken by me, in open Court in the captioned case on this date.

This the 17th day of October, 1966.

Lourse Dusenley
Court Reporter