

Adeline P. Turner

776 6792

84

Clifford Williams

JUNE LIST- JUNE 13, 1966

1. Agerton, R.H., Jr., Newport, Bay Minette
2. Allen, James B., Jr., Farmer, Indian
3. Bernhill, David, Postmaster, Robertsdale
4. Bodden, C.A., Ala. Power Co., Bay Minette
5. Bray, S.A., Civil Service, Spanish Fort
6. Bruhn, Henry C., Civil Service, Eiberta
7. Buchanan, B. Rram, Grand Hotel, Fairhope
8. Bulman, George W., Shipyard, Fairhope
9. Burmester, Fritiz, Farmer, Fairhope
10. Casteel, Jim, Brookley Field, Elseanor
11. Coleman, Cecil, Brookley Field, Bay Minette
12. Chestang, J.C., Civil Service, Stapleton
13. Crawford, Russell M., Electrician, Bay Minette
14. Crosby, John D., Jr., Millman, Bay Minette
15. Duffee, Kenneth, Brookley Field, Stockton
16. Dukes, Dories, Merchant, Foley
17. Egerton, James W., Farmer, Bay Minette
18. Gable, Bill, Laborer, Fairhope
19. Garner, Carey, Klemps, Fairhope
20. Garriah, Hunter, Southern Auto Parts, Fairhope
21. Hadley, Shomo, Street Dept., Foley
22. Holmes, Ernest, Clerk, Bay Minette
23. Humphrey, Charles C., Salesman, Bay Minette
24. Kendrick, Rivers, Farmer, Robertsdale
25. Langham, Ernest, Carpenter, Fairhope
26. Lett, Leroy, Brookley Field, Daphne
27. Little, Clyde, Mechanic, Bay Minette
28. Long, Alfred, Farmer, Stockton
29. McGill, Harold B., Merchant, Perdido
30. McKinley, Alex D., Post Office, Bay Minette
31. Morris, Ossie Victor, Farmer, Gateswood
32. Mosley, A.A., Builder, Stapleton
33. Pittman, Joe T., Farmer, Gateswood
34. Sheldon, Edward, Brick Layer, Fairhope
35. Smith, Sidney K., State Employee, Bay Minette
36. Stewart, Aubrey J., Farmer, Ruston
37. Stewart, Frank, State Emp., Gulf Shores
38. Still, Harry, Merchant, Bay Minette
39. Sute, Anthony, Banker, Foley
40. Thompson, Joseph, Newport Industry, Bay Minette
41. Waters, J. Douglas, Farmer, Gateswood
42. Harrington, Allen, Grand Hotel, Fairhope

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41
12
29
12
17

P XXXXX XXXX

D XXXXX XXXX

CODE 205
Telephone: 928-9836

LAW OFFICES

Mailing Address
P.O. BOX 471

E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

March 8, 1966

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Adeline Turner
Vs: Clifford Williams
Number 6792
Our File: 66-29

Enclosed find Demurrer. Please process and oblige.

Yours very truly,



EGR/jlb
Encl.

cc: Mr. J. Conner Owen

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6292

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CLIFFORD WILLIAMS

c/o SYNWARDS

613 JOHNSON STREET

FAIRHOPE, 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.....

CLIFFORD WILLIAMS

....., Defendant.....

ADELINE P. TURNER

by Plaintiff.....

Witness my hand this 14th day of December 1965

Alice J. Luck Clerk

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6792

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonCLIFFORD WILLIAMS.....

.....c/o SYNWARDS.....

.....613 JOHNSON STREET.....

.....FAIRHOPE, 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.....

.....CLIFFORD WILLIAMS....., Defendant.....

byADELINE P. TURNER.....

....., Plaintiff.....

Witness my hand this.....14th.....day of.....December.....19.....65.....

.....Alice J. Luck..... Clerk

ADELINE P. TURNER,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
vs.)	
CLIFFORD WILLIAMS,)	BALDWIN COUNTY, ALABAMA
Defendant.)	LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages for that, on, to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the Plaintiff was injured in this: she received severe injury to her back and spine; her neck was injured; she has been confined in a hospital; she was caused to incur medical and hospital expense; she was made sick and sore and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$750.00) as damages for that, on to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the

automobile of the Plaintiff was damaged in this: the right side of said automobile was badly bent, broken and smashed, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

J. CONNOR OWENS, JR.

By: Walter S. Patton

Attorney for Plaintiff.

FILED

DEC 11 1905

ALICE J. DUCK, CLERK
REGISTER

February 1, 1966

ADELINE P. TURNER, Plaintiff
VS
CLIFFORD WILLIAMS, Defendant

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

CASE NO. 6792

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on January 24, 1966
I sent by certified mail in an envelope addressed as follows:

Clifford Williams
326 North Fairfield
Hamilton, Ontario

"Certified Mail—
Return Receipt Requested
Deliver to Addressee Only" *

*Canada's postal regulations prohibit mail being sent marked "DELIVER TO ADDRESSEE ONLY." bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

" Clifford Williams
326 North Fairfield
Hamilton, Ontario

You will take notice that on January 24, 1966 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: ADELINE P. TURNER, Plaintiff VS CLIFFORD WILLIAMS, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
Case No. 6792 a true copy of which summons and complaint is attached hereto and the said service upon me as Secretary of State of the State of Alabama has the force and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 24 day of January 1966

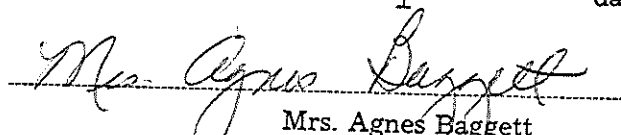
Enclosure (1)

(Signed) Mrs. Agnes Baggett
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed as above set forth had attached to it a true copy of the summons and complaint in the above-styled cause.

I further certify that on Feb 1 1966 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Hamilton Ont.
on Jan 28 1966

WITNESS MY HAND and the Great Seal of the State of Alabama this the 1 day of February 1966


Mrs. Agnes Baggett
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Hon. J. Connor Owens, Jr.
Dahlberg Bldg.
Bay Minette, Ala.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6792

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonCLIFFORD WILLIAMS.....
.....326 NORTH FAIRFIELD.....
.....HAMILTON, ONTARIO.....

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.....

CLIFFORD WILLIAMS

....., Defendant.....

byADELINE P. TURNER.....

CLIFFORD WILLIAMS

....., Plaintiff.....

Witness my hand this.....21.....day of.....January.....1966.....

.....*W. J. Hensley*....., Clerk

ADELINE P. TURNER,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	LAW SIDE. NO. 6792.
CLIFFORD WILLIAMS,)	
Defendant.)	

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages for that, on, to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the Plaintiff was injured in this: she received severe injury to her back and spine; her neck was injured; she was confined in a hospital; she was caused to incur medical and hospital expense; she was made sick and sore and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$750.00) as damages for that, on to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the

2129
automobile of the Plaintiff was damaged in this: the right side of said automobile was badly bent, broken and smashed, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

J. CONNOR OWENS, JR.

By:

Walter S. Patton

Attorney for Plaintiff.

Pursuant to Title 7, Section 199, Code of Alabama, as recompiled 1958, as amended in 1963, I, the undersigned Attorney for the Plaintiff in the above styled matter do hereby request that service or process on the Defendant in said cause, be made on the Secretary of the State of Alabama.

Walter S. Patton

Filed 12-14-65
Aerie French

ADELINE P. TURNER,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
vs.)	
CLIFFORD WILLIAMS,)	BALDWIN COUNTY, ALABAMA
Defendant.)	LAW SIDE.

6792

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages for that, on, to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the Plaintiff was injured in this: she received severe injury to her back and spine; her neck was injured; she has been confined in a hospital; she was caused to incur medical and hospital expense; she was made sick and sore and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$750.00) as damages for that, on to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the

automobile of the Plaintiff was damaged in this: the right side of said automobile was badly bent, broken and smashed, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

J. CONNOR OWENS, JR.

By: Walter S. Owens

Attorney for Plaintiff.

FILED

DEC 14 1965

ALICE L. DUCK, CLERK
REGISTER

The 12 jurors find for the Plaintiff and
award Damages of \$5,000.00 ^{Count} ~~first~~ 1

~~award Damages at \$500.00 ^{Count} ~~first~~ 2~~

John L. Steel D
Foreman

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CLIFFORD WILLIAMS
..... c/o SYNWARDS
..... 613 JOHNSON STREET
..... FAIRHOPE, 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.....

CLIFFORD WILLIAMS

....., Defendant.....

ADELINE P. TURNER

by
....., Plaintiff.....

Witness my hand this..... 14th day of December 19 65

N.F.

438

Alice Duck Clerk

No. 6792

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

ADELINE P. TURNER

Plaintiffs

vs.

CLIFFORD WILLIAMS

Defendants

SUMMONS AND COMPLAINT

Filed 12/14/65 19.....

Clerk

J. CONNOR OWENS, JR.

Plaintiff's Attorney

Defendant's Attorney

Not found (Randal)

Defendant lives at
c/o The Synwards
613 Johnson Street
Fairhope, Alabama

Received in Office

DEC 15 1965 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Returned 3 day of Jan 1966
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

By Roy Randal
Deputy Sheriff

..... Sheriff

..... Deputy Sheriff

ADELINE P. TURNER,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
vs.)	BALDWIN COUNTY, ALABAMA
CLIFFORD WILLIAMS,)	
Defendant.)	LAW SIDE. NO. 6792

Now comes the Plaintiff in the above styled cause and for answer to the plea of recoupment heretofore filed by the Defendant in the above styled cause says:

1. Not guilty.
2. That at the time and place complained of the Defendant was guilty of negligence which proximately contributed to his damages and injuries, because of which he should not recover in this suit.

Walter S. Patton
Attorney for Plaintiff.

I, the undersigned Walter S. Patton, do hereby certify that I have this day mailed a copy of the foregoing to E. G. Rickarby, Attorney for the Defendant in the within styled cause, properly addressed, with postage prepaid, this 19th day of May, 1966.

FILED

MAY 20 1966

ALICE L. DUCK, CLERK
REGISTER

ADELINE P. TURNER,	Ø	
Plaintiff,	Ø	IN THE CIRCUIT COURT OF
VS.	Ø	BALDWIN COUNTY, ALABAMA,
CLIFFORD WILLIAMS,	Ø	LAW SIDE NO. 6792
Defendant.	Ø	

Comes the Defendant, CLIFFORD WILLIAMS, and in Answer to the Plaintiff's Complaint and for each and every Count thereof, offers the following pleas:

ONE:

The Defendant, for Answer to the Complaint, saith that he is not guilty of the matters alleged therein.

TWO:


The Defendant alleges that the Plaintiff ought not to recover for the Plaintiff herself was guilty of negligence, which contributed to the accident and Plaintiff's damages, in that she so negligently operated a motor vehicle on U. S. Highway 98 at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both public roads in the City of Fairhope, as to cause or allow such vehicle to run into, or against the automobile of the Defendant, which the Defendant was then and there operating at said time and place.

THREE:

The Defendant alleges that the Plaintiff ought not to recover for the Plaintiff herself was guilty of negligence, which contributed to the accident, and the Plaintiff's damages in that she so negligently operated a motor vehicle on U. S. Highway 98 at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both public roads in the City of Fairhope, by driving through a stop light in the City of Fairhope contrary to Section 13-3 of the Code of the City of Fairhope, as to cause or allow her vehicle to run into or against the automobile of the Defendant, which the Defendant was then and there operating at said time and place.

FOUR:

The Defendant, as a defense to said action of the Plaintiff, saith that at the time said action was commenced, the Plaintiff was indebted to him in the sum of FIVE THOUSAND AND NO/100 DOLLARS (\$5,000.00) damages for that on, to-wit, the 29th day of November, 1965, the Plaintiff, ADELINE P. TURNER, so negligently operated a motor vehicle on U. S. Highway 98 at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both public roads in the City of Fairhope, as to cause or allow such vehicle to run into or against the automobile of the Defendant, which the Defendant was then and there operating at said time and place and as an approximate result of the negligence of the Plaintiff, the automobile of the Defendant was damaged and demolished and Defendant lost the use of said automobile to return he and his wife to their home in Canada, and as the approximate result of the negligence of the Plaintiff, the Defendant's wife, who was riding in said car was injured in that her scalp was deeply lacerated and she had multiple abrasions and contusions and the Defendant incurred and had to pay large sums to the Thomas Hospital in Fairhope, Alabama, and to the Ontario Hospital Service Commission in Toronto, Canada, and pay his cost of transportaion back to Canada for himself and his personal goods and lost ten (10) days' wages, which he hereby offers to set-off against the demands of the Plaintiff and claims a judgment for the excess.


E. G. RICKARBY, Attorney for the
Defendant.

Filed 5-19-66
Revised 5-19-66
clerk

ADELINE P. TURNER,	Ø	
Plaintiff,	Ø	IN THE CIRCUIT COURT OF
VS.	Ø	BALDWIN COUNTY, ALABAMA,
CLIFFORD WILLIAMS,	Ø	LAW SIDE. #6792
Defendant.	Ø	

D E M U R R E R S

Comes the Defendant, CLIFFORD WILLIAMS, and offers the following grounds of demurrer to the Plaintiff's complaint and each and every count thereof:

COUNT ONE

Said Counts are vague, indefinite and uncertain.


COUNT TWO

The allegations of personal injury is general so that the Defendant cannot tell what the injuries are or how serious they are.



 Attorney for Clifford Williams,
 Defendant.

Defendant demands a trial by jury.



 E. G. RICKARBY, Attorney for
 Defendant.

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in an envelope with adequate postage prepaid thereon and properly addressed.

This 9th day of March 1966

E. G. RICKARBY



 Attorney for
 P. O. Box 471, Fairhope, Ala. 36532

FILED
 MAR 10 1966
 MAR 1 1966
 CLERK OF COURT

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$750.00) as damages for that, on to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the

COUNT TWO:

The Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages for that, on, to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both streets of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the Plaintiff was injured in this: she received severe injury to her back and spine; her neck was injured; she was confined in a hospital; she was caused to incur medical and hospital expense; she was made sick and sore and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

COUNT ONE:

IN THE CIRCUIT COURT OF)	ADELINE P. TURNER,
BALDWIN COUNTY, ALABAMA)	Plaintiff,
LAW SIDE. NO. 6792.)	vs.
)	CLIFFORD WILLIAMS,
)	Defendant.

automobile of the Plaintiff was damaged in this: the right side of said automobile was badly bent, broken and smashed, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

J. CONNOR OWENS, JR.

By:

Walter S. Patton

Attorney for Plaintiff.

Pursuant to Title 7, Section 199, Code of Alabama, as recompiled 1958, as amended in 1963, I, the undersigned Attorney for the Plaintiff in the above styled matter do hereby request that service or process on the Defendant in said cause, be made on the Secretary of the State of Alabama.

Walter S. Patton

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6794

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CLIFFORD WILLIAMS

326 NORTH FAIRFIELD

HAMILTON, ONTARIO

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.....

CLIFFORD WILLIAMS

....., Defendant.....

by ADELINE P. TURNER

CLIFFORD WILLIAMS

....., Plaintiff.....

Witness my hand this 21 day of January 19 66

E. J. - 1-24-66 - Sec. of State David J. Duck Clerk
Reg. Mail 1-28-66 on Regt - 441

No. 6792

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Adeline C. Turner

Plaintiffs

vs.

Clifford Williams
Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... Clerk

Plaintiff's Attorney

Defendant's Attorney

1975
RECEIVED IN OFFICE

Defendant lives at

JAN 7 1966

Received In Office

M. S. BUTLER, Sheriff

JAN 21 1966

TAYLOR WILKINS

SHERIFF

19.....

I have executed this summons

this 19.....

by leaving a copy with

Executed by serving 3 copies of

the within on Agnes Baggett

Secretary of State of The State of
Alabama.

This the 24 day of Jan 1966

Sheriff of Montgomery County

M. S. Butler,

By J. B. Jones D. S.

The Sheriff claims 2

miles at 10c per mile for a total

20

M. S. Butler, Sheriff

Montgomery County, Ala.

Deputy Sheriff

ADELINE P. TURNER,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	
CLIFFORD WILLIAMS,)	LAW SIDE. NO. 6792.
Defendant.)	

AMENDED COMPLAINT

Now comes the Plaintiff in the above styled cause and amends the complaint heretofore filed in said cause, so that as amended said complaint shall read as follows:

COUNT ONE:

The Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages for that, on, to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama, said point being the intersection of Fels Avenue and Church Street, both public road of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the Plaintiff was injured in this: she received severe injury to her back and spine; her neck was injured; her muscles were torn from her shoulder blade and from her neck; she was confined in a hospital; she was caused to incur medical and hospital expense; she was made sick and sore and she is permanently injured; she has lost wages as a result of this injury, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$750.00) as damages for that, on to-wit, the 29th day of November, 1965, the Defendant, Clifford Williams, so negligently operated a motor vehicle on U. S. Highway No. 98, at a point in the City of Fairhope, Baldwin County, Alabama

said point being the intersection of Fels Avenue and Church Street, both public roads of the City of Fairhope, as to cause or allow such vehicle to run into or against an automobile of the Plaintiff, which she was then and there operating at said time and place, and as a proximate result of the negligence of said Defendant, the automobile of the Plaintiff was damaged and demolished, all to the damage of the Plaintiff in the sum above mentioned; hence this suit.

J. CONNOR OWENS, JR.

By: Walter S. Patton

Attorney for Plaintiff.

I, the undersigned, do hereby certify that I have this day forwarded a copy of the foregoing amended complaint to Elliot G. Rickarby, Attorney at Law, Fairhope, Alabama, the attorney for the Defendant in the above styled cause, by United States mail, properly addressed, with postage prepaid, this 27th day of April, 1966.

Walter S. Patton

FILED

APR 27 1966

ALICE J. DUCK, CLERK
REGISTER