

SHALER HAUSER, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
-vs- :
SIDNEY WILLS CROMER, : AT LAW
Defendant. : CASE NO. 7053

COUNT ONE

The Plaintiff claims of the Defendant the sum of Three Thousand and No/100 (\$3,000.00) Dollars for that heretofore and on to-wit the 6th day of July, 1965, the plaintiff's/^{minor}son was riding as a passenger in a motor vehicle being operated by the defendant, Sidney Wills Cromer, and said motor vehicle was being operated on Alabama Highway 135 at a point to-wit, 528 feet North of the intersection of Alabama Highway 182 and Alabama Highway 135, both of said highways being public roads in the County of Baldwin, State of Alabama, and at said time and place as aforesaid, the defendant, Sidney Wills Cromer wantonly injured the plaintiff's ^{minor}son by so wantonly operating the aforesaid vehicle so as to cause it to run into, upon, over and against a pine tree and as a direct and proximate result of the aforesaid wanton misconduct of the defendant, Sidney Wills Cromer, the plaintiff's/^{minor}son was wantonly injured in that he received extremely extensive lacerations of most of his face, especially his forehead, left cheek, left scalp, and extremely destructive series of lacerations and avulsions of his left ear, fractures of the skull, facial bones and right forearm, avulsions of the soft tissues of his left cheek, much of the tissue of his left ear was completely destroyed, a depressed fracture of the

frontal bone (lower forehead), persistent infection, multiple lacerations of the face, forehead, ear, scalp, nose, left cheek and mouth, as well as multiple compound fractures of the orbits, maxilla and frontal bone, there was also a fracture of the radius and ulna on the right; he was made sick and sore, suffered physical pain and mental anguish, and will continue to suffer pain and mental anguish in the future, he was made extremely nervous, and the plaintiff was caused to spend money in the care and treatment of his/^{minor}son, HENCE THIS SUIT.

LYONS, PIPES AND COOK
Attorneys for the Plaintiff

By: 
Gordon B. Kahn

Defendant may be served at:

Uniontown, Alabama.

Plaintiff respectfully requests that an additional copy of the Summons and Complaint be served upon Andrew Cromer as father of Sidney Wills Cromer who is believed to be a minor over the age of Fourteen (14) years.

Plaintiff respectfully demands a trial by jury.


Gordon B. Kahn

*Executed 7-21-66
Lofis-Berry Co. Shu.
by Carl Fortner-WS*

FILED
JUL 12 1966
ALICE J. DUCK, CLERK
CLERK

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

Sidney Wills Cromer

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.....

Sidney Wills Cromer

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

by Shaler Hauser

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

Witness my hand this.....12th.....day of.....July.....19.66.....

Allegan Clerk

Executed
7/21/66

No. 7253

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Shaler Housey

Plaintiffs

vs.

Sidney Wills Cromer
Defendants

SUMMONS AND COMPLAINT

Filed 7-12-66 1966

Beig French Clerk

Lynn, Piper & Cook
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

JUL 12 1966

..... 19.....

TAYLOR WILKINS

SHERIFF

....., Sheriff

I have executed this summons

this 7/21 1966

by leaving a copy with

Mrs S. M. Cromer

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Perry Co. W. R. Lott Sheriff



Carl Foster Deputy Sheriff

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Plaintiff, : BALDWIN COUNTY, ALABAMA
vs. : AT LAW
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A N S W E R

Comes now the Defendant in the above-styled cause,
and for answer to each separate and several count of
the complaint filed herein, separately and severally,
assigns the following separate and several pleas, separately
and severally:

1. The Defendant, for answer to the complaint, saith
that the claim described in the complaint is barred by
the statute of limitations of one year.
2. The claim stated in said count is barred by the
one year statute of limitations in that the complaint
was not filed with this Court until July 12, 1966, although
the accident upon which the suit is based occurred on
July 6, 1965.
3. Not guilty.
4. The material allegations thereof are untrue.

Defendant demands a trial by jury.


First National Bank Building
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to G. B. Kahne, Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Mobile, Alabama on this, the 29 day of

July, 1966.

Line E. Brandt

FILED

AUG 1 1966

ALICE L. DICK, ~~CLERK~~ REGISTER