

DOROTHY M. OWENS,	*	IN THE CIRCUIT COURT
Plaintiff,	*	OF
vs.	*	BALDWIN COUNTY, ALABAMA
STEPHEN YEARLEY,	*	AT LAW
Defendant.	*	NO. <u>7108</u>

COUNT ONE

Plaintiff claims of the Defendant the sum of TEN THOUSAND AND NO/100 (\$10,000.00) DOLLARS, as damages, for that heretofore and on, to-wit, the 7th day of August, 1965, the Defendant so negligently operated a motor vehicle which he was driving eastwardly on U. S. Highway 90 in Loxley, Baldwin County, Alabama, which is a public highway in Baldwin County, Alabama, as to cause or allow the same to run into, upon, or against another automobile which was stopped in a line of traffic headed eastwardly on said Highway 90 at said time and place, which in turn caused the said automobile to be knocked, pushed or shoved into the rear of the automobile in which the Plaintiff was a passenger, but which was also stopped in a line of traffic, and as a direct and proximate consequence of said negligence, the Plaintiff was severely bruised and injured, she suffered a whip lash injury to her spine, she suffered great pain and anguish and will continue to suffer great pain and anguish and was caused to incur doctors' bills in and about the treatment of her injuries; hence this suit.

HOLBERG, TULLY AND HODNETTE  
Attorneys for Plaintiff

BY *[Signature]*

Plaintiff demands a trial of this cause by a Jury.

HOLBERG, TULLY AND HODNETTE  
Attorneys for Plaintiff

BY *[Signature]*

**FILED**

AUG 5 1965

MADE 1 DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7108

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Stephen Yearley

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.....

Stephen Yearley

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

by Dorothy M. Owens

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

Witness my hand this 5 day of August 19 66

Defendant's address: 3040 Binkley, Dallas, Texas *Devin J. Clark* Clerk

*Executed  
Sept. 23, 1966*

STATE OF ALABAMA  
Baldwin County

## CIRCUIT COURT

DOROTHY M. OWENS

Plaintiffs

vs.

STEPHEN YEARLEY

Defendants

## SUMMONS AND COMPLAINT

Filed 8-5 19. 66

Alice J. Duck Clerk

Holberg, Tully &amp; Hodnotte

Plaintiff's Attorney

Defendant's Attorney

RECEIVED IN OFFICE

SEP 22 1966

Defendant, lives at  
TAYLOR WILKINS  
SHERIFF

M. S. Butler, Sheriff  
Received In Office

AUG 18 1966

TAYLOR WILKINS Sheriff

I have executed this summons

this 23 Sept 1966  
by leaving a copy with

Agness Baggett  
As Sec of State

The Sheriff claims 2  
miles at 10c per mile for a total  
of \$ 2.00  
M. S. Butler, Sheriff  
Montgomery County, Ala.

M. S. Butler Sheriff  
Billy Whit Deputy Sheriff

SUMMONS AND COMPLAINT

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STATE OF ALABAMA

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

by Dorothy M. Owens  
.....

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

Witness my hand this 5 day of August 1966

Alice J. Muck Clerk

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