

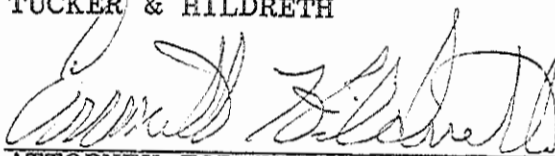
MOTION TO DISMISS.

MILES SANDERS,	X	IN THE CIRCUIT COURT OF
PLAINTIFF.	X	BALDWIN COUNTY, ALABAMA.
vs.	X	AT LAW.
MACK GRAY,	X	CASE NO: <u>7316</u>
DEFENDANT.	X	

Comes now the Plaintiff by his Attorney, and moves the Court to dismiss the above styled cause, at Plaintiff's cost and as grounds therefor respectfully shows:

That all matters in controversy in this suit between plaintiff and defendant have been fully settled and compromised by agreement, and that there is no further occasion for the prosecution of this suit.

TUCKER & HILDRETH



ATTORNEY FOR PLAINTIFF.

FILED

JAN 9 1967

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA X
BALDWIN COUNTY X

IN THE CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon MACK GRAY, Star Route A, Atmore, Alabama; to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, and plead, answer, or demur within thirty (30) days from service hereof, to the complaint of MILES SANDERS, PLAINTIFF.

Witness my hand this 16 day of December, 1966.

Alice J. Duck
CLERK

* * * * *

C O M P L A I N T .

MILES SANDERS,
PLAINTIFF.
vs.
MACK GRAY,
DEFENDANT.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.
CASE NO. 7316.

COUNT ONE.

THE PLAINTIFF, MILES SANDERS, claims of the Defendant, Mack Gray, the sum of Twenty Thousand (\$20,000.00) Dollars, as damages, for that heretofore and on, to-wit; the 17th day of December, 1965, the Plaintiff, Miles Sanders, was a passenger in an automobile upon a public highway in Baldwin County, Alabama, to-wit: on county road No. 61, at its intersection with Rabon Road, some 8.6 miles north of Perdido, Alabama, in Baldwin County, Alabama, and where the Plaintiff had a right to be, and then and there the Defendant, Mack Gray, negligently drove or operated a motor vehicle and then and there the Defendant, Mack Gray, negligently drove an automobile into or upon or against the said automobile in which the Plaintiff was a passenger; and by reason thereof and as a proximate result and consequence thereof, the Plaintiff received severe and painful personal injuries, in that, to-wit:

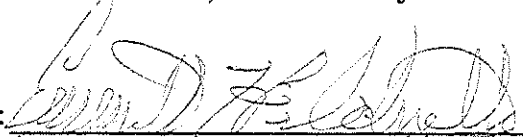
Plaintiff, Miles Sanders, received severe and painful personal injuries to his face, head, legs, and other parts of his body; Plaintiff was caused to loose much blood and suffered abrasions and contusions of the face, head, neck, chest, legs and other parts of his body; Plaintiff was made sick, sore and lame; Plaintiff was caused to suffer great mental anguish and physical pain and continues to have great pain.

Plaintiff suffered multiple skull fractures; Plaintiff's face was cut and scarred; Plaintiff suffered broken ribs; Plaintiff suffered a jaw injury and lost teeth; Plaintiff's left leg was broken; Plaintiff was caused to spend much time in the hospital.


Plaintiff, Miles Sanders, suffered a fracture of the frontal sinus, the nasal bones, the left zygomatic bone and a fracture of the left tibia; Plaintiff suffered cerebral contusion; Plaintiff's leg was in a cast for one hundred and seven (107) days.

Plaintiff was painfully and permanently injured and disabled; Plaintiff has been caused to incur expense in ambulance, hospital, doctor and other medical care and continues to have said expenses; for all of which Plaintiff claims damages;

And Plaintiff avers that his aforesaid injuries and damages were proximately caused by reason of and in consequence of the aforesaid negligence of the Defendant, Mack Gray.

BY: 
Attorney for Plaintiff.

Plaintiff requests a trial by jury of the issues involved in this cause.

BY: 
Attorney for Plaintiff.

FILED

DEC 16 1966

ALICE I. DICK, CLERK
RECORDS

Executed
12-17-66
Taylor Wilkins SR
W A Talbert JR.

