

ROSALEE B. THOMAS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
JAMES HOFFMAN FULLER,)	
Defendant.)	

Comes now the Defendant in the above styled cause and for answer to the complaint heretofore filed by the Plaintiff, saith as follows:

1. The allegations thereof are untrue.
2. The general issue.

HOWELL, JOHNSTON, LANGFORD & FINKBOHNER,
Attorneys for the Defendant.

By: _____

John L. Lawler

Defendant respectfully demands a trial by jury.

HOWELL, JOHNSTON, LANGFORD & FINKBOHNER,
Attorneys for the Defendant.

By: _____

John L. Lawler

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY THAT I HAVE ON
THIS 7 DAY OF June, 1967,
SERVED A COPY OF THE FOREGOING PLEADING
ON COUNSEL FOR ALL PARTIES TO THIS PRO-
CEEDING BY MAILING THE SAME BY UNITED
STATES MAIL, PROPERLY ADDRESSED, AND
FIRST CLASS POSTAGE PREPAID.

FILED

JUN 8 1967

ALICE J. DICK, CLERK
REGISTERED

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James Hoffman Fuller to appear within thirty-days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Rosalee B. Thomas.

Witness my hand this 17 day of May, 1967.

[Signature]
CLERK

	X	
Rosalee B. Thomas,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
James Hoffman Fuller,	X	
		AT LAW
Defendant.	X	

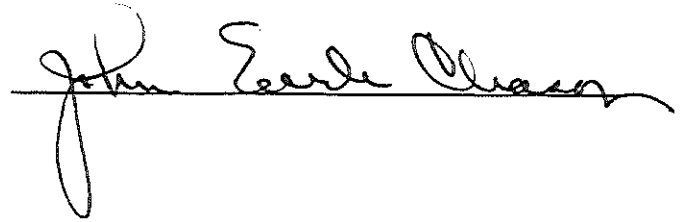
COMPLAINT

The Plaintiff claims of the Defendant the sum of Five Thousand Dollars (\$5,000), as damages, for that, heretofore on to-wit: the 17th day of December, 1966, at a point on U. S. Highway 90 approximately one mile North of Robertsdale in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle being driven by the Plaintiff, and as a proximate result

of such negligence the Plaintiff received a "whiplash" injury to her spinal column which said injury has caused her great pain and suffering and she will continue to experience pain and suffering in the future and she was caused to incur medical expenses, all as a proximate result of the negligence of the Defendant, hence this suit.

CHASON, STONE & CHASON

By:

A handwritten signature in cursive script, appearing to read "John Earle Chason", written over a horizontal line.

Defendant may be served
at: 3432 East Gulfwood Drive
Mobile, Alabama

RECEIVED

MAY 17 1967

TAYLOR WILKINS
SHERIFF

Received 18 Day of May 1967
and on 22 Day of May 1967
I served a Copy of this
on James Hoffman Fuller
by service of

RAY D. BRIDGES, Sheriff

R. B. Thomas

4/188
Rosalee B. Thomas,

Plaintiff,

vs.

225
James Hoffman Fuller,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED

MAY 18 1967

ALICE J. DUCK, CLERK
REGISTERED

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

MAY 19 9 27 AM '67

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BAY MINETTE, ALABAMA