

BONNIE WALLACE,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
JIMMY DOYLE WILLIAMS,	)	LAW SIDE. NO: <u>75-30</u>
Defendant.	)	

The Plaintiff claims of the Defendant, the sum of TEN THOUSAND DOLLARS (\$10,000.00) as damages for that on, to-wit, December 16, 1966, at about 7:30 o'clock A. M., on Palmer Street, which street is a public road in Robertsedale, Alabama, at a point thereon immediately adjacent to the main entrance to the South Baldwin Mills, the Defendant so negligently operated an automobile which he was then and there driving, so as to cause, permit or allow the said automobile to collide with, run into, upon or against a parked motor vehicle from which the Plaintiff was alighting, and as a proximate result and consequence of the negligence of the said Defendant as aforesaid, the Plaintiff suffered injuries as follows: she suffered multiple contusions and abrasions to both legs and to her abdomen; she suffered a severe cervical sprain to her neck; she suffered severe shock and pain; her legs were caused to swell and remain swollen; that she was rendered incapable of maintaining her production quota at her place of employment; and that she was caused to incur medical expense, all to the damage of the Plaintiff, hence this suit.

OWENS AND PATTON

By: J. Cameron Owens, Jr.

Attorneys for Plaintiff

Plaintiff demands a trial of this cause by a Jury.

J. Cameron Owens, Jr.  
Attorney for Plaintiff.

FILED

MAY 29 1967

ALICE L. WICK, CLERK  
REGISTER

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 ..... JIMMY DOYLE WILLIAMS

..... 808-1/2 NORTH CAROLINA STREET

..... MOBILE, 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.....

..... JIMMY DOYLE WILLIAMS

by ..... BONNIE WALLACE

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

Witness my hand this..... 19th ..... day of..... May 19 67

*Alice J. Tucker*  
..... Clerk

*Eyle-20-67*

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BONNIE WALLACE

Plaintiffs

vs.

JIMMY DOYLE WILLIAMS

Defendants

SUMMONS AND COMPLAINT

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Clerk

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ALICE S. BRYCE, CLERK

OWENS AND PATTON

by

Plaintiff's Attorney

Defendant's Attorney

W.K. at Steam Plant  
Compressed Air Section  
Brookley Field

Defendant lives at  
808-1/2 NORTH CAROLINA STREET  
MOBILE, ALABAMA

RECEIVED  
Received In Office

MAY 19 1967

JUN 6 1967

TAYLOR WILKINS

SHERIFF

Sheriff

TAYLOR WILKINS

I have executed this summons

this June 20 19 67  
by leaving a copy with

RETURNED

379 67

Not found in my County after dili-  
gent search and inquiry.

RAY D. BRIDGES, Sheriff

By D. S. [Signature] D. S.

Jimmy Doyle Williams

Ray D. Bridges, Sheriff

W. G. Fischer, Deputy Sheriff

BONNIE WALLACE, : IN THE CIRCUIT COURT OF  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
VS: :  
JIMMY DOYLE WILLIAMS, : AT LAW  
Defendant. : CASE NO. 7 5 3 0

Comes the Defendant in the above styled matter and  
for answer to the complaint says as follows:

1. Not guilty.
2. The Plaintiff cannot have and recover of the  
Defendant in this matter for at the time and place set out  
in the complaint, to-wit, December 16, 1966, on Palmer Street  
in Roberstdale, Alabama, at a point immediately adjacent to  
the main entrance to South Baldwin Mills the Plaintiff herself  
was guilty of negligence which proximately contributed to the  
injuries complained of in the complaint, hence she cannot  
recover.

COLLINS, GALLOWAY & MURPHY

By: Thomas M. Galloway  
THOMAS M. GALLOWAY  
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 2nd  
day of Aug, 1967, served a copy of the  
foregoing filing on counsel for all parties to this  
proceeding by mailing the same by United States mail,  
properly addressed, and first class postage prepaid.

Thomas M. Galloway

FILED

AUG 3 1967

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AUGUST DUCK, CLERK  
REGISTER