

| | | |
|------------------|---|-------------------------|
| MAUDEAN PEACOCK, |) | |
| |) | IN THE CIRCUIT COURT OF |
| Plaintiff, |) | |
| vs. |) | BALDWIN COUNTY, ALABAMA |
| WALTER M. WHITE, |) | |
| |) | LAW SIDE. |
| Defendant. |) | 7563 |

The Plaintiff claims of the Defendant the sum of FIVE THOUSAND DOLLARS (\$5,000.00) as damages for heretofore on, to-wit, the 20th day of December, 1966, Plaintiff was operating an automobile on, to-wit, Alabama Highway Number 59, a public highway in Baldwin County, Alabama, and also known as the Bay Minette to Stockton Highway, at its intersection with an unnamed dirt road, said intersection being approximately 1.7 miles North of the Baldwin County Courthouse in Bay Minette, Alabama, and .3 miles South of the intersection of said Highway Number 59 with Baldwin County Road No. 47, the Bethel Baptist Church being located in the Northwest corner of said intersection, and at said time and place the Defendant so negligently caused or allowed the vehicle which he was then and there operating to collide with the vehicle in which Plaintiff was operating as aforesaid, and as a proximate consequence of said negligence thereof, Plaintiff suffered the following injuries and damages: Plaintiff's shoulders and neck were bruised, contused and otherwise injured and damaged; she sustained an injury to her cervical spine, resulting in the ligaments, muscles and other internal parts of her neck being sprined, strained, pulled, torn and otherwise injured and damaged; she sustained an injury to her upper lip, resulting in the lip being bruised, contused and otherwise injured and damaged in that knots or lumps formed inside her upper lip as a result of said injury; she sustained an injury to a tooth in that said tooth was jarred, shocked and otherwise injured and damaged and as a result of said injury it was necessary to remove said tooth and replace it with an artificial tooth; and

she was caused to suffer physical pain and mental anguish, all to the injury and damage of the Plaintiff, hence this suit.

OWENS AND PATTON

By: Walter S. Patton
Attorneys for Plaintiff.

Plaintiff demands a trial of this cause by a Jury.

Walter S. Patton
Attorneys for Plaintiff.

FILED

JUN 9 1967

ALICE S. BUX, CLERK
JUN 9 1967

SUMMONS AND COMPLAINT

MOORE PRINTING CO., 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

WALTER M. WHITE

106 Vines Street

Bay Minette, 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.....

Walter M. White

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

by Maudean Peacock

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

Witness my hand this

9th day of

June

19 67

Executed 6-13-67

by M. Peacock
of M. Peacock D.S.

Alice J. Luck

Clerk

No. 7563

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MAUDEAN PEACOCK

Plaintiffs

vs.

WALTER M. WHITE

Defendants

SUMMONS AND COMPLAINT

Filed JUNE 9 1967 67

Clerk

OWENS AND PATTON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
106 Vines Street
Bay Minette, Alabama

Received In Office
JUN 9 1967

TAYLOR WILKINS
SHERIFF

19.....

Sheriff

I have executed this summons

this 6-13 1967

by leaving a copy with

Walter M. White

Taylor Wilkins Sheriff
W. A. Bell Deputy Sheriff

MAUDEAN PEACOCK,

Plaintiff,

vs.

WALTER M. WHITE,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

CASE NUMBER 7563

PLEAS

Comes now the Defendant in the above styled cause and by his attorney, and for answer to the Complaint heretofore filed against him, says as follows:

(1) Not guilty.

(2) That the Plaintiff at the time and place complained of was guilty of negligence which proximately contributed to her injuries and damages in that she so negligently operated a motor vehicle at said time and place as to cause or allow the same to run into, upon or against the automobile being then and there operated by the Defendant; hence she should not recover.

Respectfully submitted,

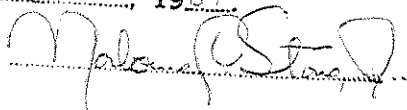
CHASON, STONE & CHASON

By:


Attorneys for the Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 17 day of June, 1967.



FILED

JUN 22 1967

ALICE L. OUCH, CLERK
RECEIVED

MAUDEAN PEACOCK,
Plaintiff,

VS.

WALTER M. WHITE,
Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE NO. 7563

* * * * *

PLEAS

* * * * *

FILED

JUN 22 1967

Alice J. Duck, Clerk
Register

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