

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert Dalton Allen and Mrs. Samuel Ellis Allen 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 the same, then and there to answer the complaint of Virginia Stewart, a minor suing by and through Viola L. Stewart, as her mother and next friend.

WITNESS my hand this 27 day of August, 1967.

David J. Smith
Clerk

Both of the defendants reside at
108 Section Street, Fairhope, Alabama

* * * * *

VIRGINIA STEWART, a minor	)	
suing by and through Viola	)	
L. Stewart, as her mother and	)	IN THE CIRCUIT COURT OF
next friend,	)	BALDWIN COUNTY, ALABAMA
	)	
Plaintiff,	)	
	)	
VS.	)	AT LAW
	)	720.7695
ROBERT DALTON ALLEN and	)	
MRS. SAMUEL ELLIS ALLEN,	)	
	)	
Defendants.	)	

C O M P L A I N T

COUNT ONE

Plaintiff claims of the defendant, Robert Dalton Allen, the sum of Twenty-five Thousand Dollars (\$25,000.00) for that heretofore on to-wit, September 6, 1966, at a point on Gayfer Road extension, approximately 1.1 mile East of Fairhope, Baldwin County, Alabama, the said defendant negligently parked a motor vehicle on the main travel portion of said road during the hours of darkness without any visible lights in lane of traffic in which a motor vehicle in which the plaintiff was a passenger was traveling and as a proximate result of the negligence of the said defendant, as aforesaid, the automobile in which the plaintiff was a passenger was

caused to run into, upon or against the said automobile of the defendant and plaintiff was injured and damaged as follows: she suffered a severe lacerated wound of her neck; she suffered multiple contusions and abrasions; she suffered shock; she suffered extensive injuries to her teeth and loss of teeth; she suffered an inability to move the right corner of her lower lip; she suffered a severe laceration of the face and neck; right ankle and left wrist and a severe laceration of the right wrist; it was necessary for plaintiff to be hospitalized for a long period of time and she was caused to spend large sums of money in and about the treatment of her injuries for doctors and hospital bills. She was made sick, sore and nervous and suffered severe mental anguish as a result of her said injuries and damages. Plaintiff avers that all of her injuries and damages were caused as a proximate result of the negligence of the defendant, Robert Dalton Allen, at said time and place complained of, hence this suit.

COUNT TWO

Plaintiff claims of the defendants Twenty-five Thousand Dollars (\$25,000.00) damages for that heretofore on to-wit, September 6, 1966, at a point on Gayfer Road extension approximately 1.1 mile East of the limits of Fairhope, Baldwin County, Alabama, the defendant, Robert Dalton Allen, who was at said time and place an agent, servant or employee of the defendant, Mrs. Samuel Ellis Allen, acting within the line and scope of his authority as such agent, servant or employee, negligently parked a motor vehicle on said road during the hours of darkness without any visible lights thereon and as a proximate result thereof, an automobile in which the plaintiff was a passenger ran into, upon or against said motor vehicle which was parked at said time and place in the lane of travel reserved for the plaintiff's motor vehicle and as a proximate result of the negligence of the said defendant at said time and place the plaintiff was injured and damaged as follows: she suffered a severe lacerated wound of her neck; she suffered multiple contusions

and abrasions; she suffered shock; she suffered extensive injuries to her teeth and loss of teeth; she suffered an inability to move the right corner of her lower lip; she suffered a severe laceration of the face and neck, right ankle and left wrist and a severe laceration of the right wrist; it was necessary for plaintiff to be hospitalized for a long period of time and she was caused to spend large sums of money in and about the treatment of her injuries for doctors and hospital bills. She was made sick, sore and nervous and suffered severe mental anguish as a result of her said injuries and damages. Plaintiff further avers that all of her injuries and damages were caused as a proximate result of the negligence of the defendant, Robert Dalton Allen, who was then and there an agent, servant or employee of the defendant, Mrs. Samuel Ellis Allen, acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

FILED

AUG 22 1967

ALICE J. DUCK

CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert Dalton Allen and Mrs. Samuel Ellis Allen 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 the same, then and there to answer the complaint of Virginia Stewart, a minor suing by and through Viola L. Stewart, as her mother and next friend.

WITNESS my hand this 22 day of August, 1967.

W. J. J. J. J.
Clerk

Both of the defendants reside at
108 Section Street, Fairhope, Alabama

* * * * *

VIRGINIA STEWART, a minor
suing by and through Viola
L. Stewart, as her mother and
next friend,

Plaintiff,

VS.

ROBERT DALTON ALLEN and
MRS. SAMUEL ELLIS ALLEN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
No. 7695

C O M P L A I N T

COUNT ONE

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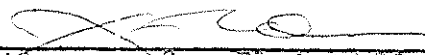
caused to run into, upon or against the said automobile of the defendant and plaintiff was injured and damaged as follows: she suffered a severe lacerated wound of her neck; she suffered multiple contusions and abrasions; she suffered shock; she suffered extensive injuries to her teeth and loss of teeth; she suffered an inability to move the right corner of her lower lip; she suffered a severe laceration of the face and neck; right ankle and left wrist and a severe laceration of the right wrist; it was necessary for plaintiff to be hospitalized for a long period of time and she was caused to spend large sums of money in and about the treatment of her injuries for doctors and hospital bills. She was made sick, sore and nervous and suffered severe mental anguish as a result of her said injuries and damages. Plaintiff avers that all of her injuries and damages were caused as a proximate result of the negligence of the defendant, Robert Dalton Allen, at said time and place complained of, hence this suit.

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and abrasions; she suffered shock; she suffered extensive injuries to her teeth and loss of teeth; she suffered an inability to move the right corner of her lower lip; she suffered a severe laceration of the face and neck, right ankle and left wrist and a severe laceration of the right wrist; it was necessary for plaintiff to be hospitalized for a long period of time and she was caused to spend large sums of money in and about the treatment of her injuries for doctors and hospital bills. She was made sick, sore and nervous and suffered severe mental anguish as a result of her said injuries and damages. Plaintiff further avers that all of her injuries and damages were caused as a proximate result of the negligence of the defendant, Robert Dalton Allen, who was then and there an agent, servant or employee of the defendant, Mrs. Samuel Ellis Allen, acting within the line and scope of his authority as such agent, servant or employee, hence this suit.

FILED
AUG 22 1967
ALICE J. DUCK
CLERK
REGISTER


Attorney for Plaintiff

FILED

AUG 22 1967

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

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WITNESS my hand this 22 day of August, 1967.

Rebecca Allen
Clerk

Both of the defendants reside at
108 Section Street, Fairhope, Alabama

* * * * *

VIRGINIA STEWART, a minor	)	
suing by and through Viola	)	
L. Stewart, as her mother and	)	IN THE CIRCUIT COURT OF
next friend,	)	BALDWIN COUNTY, ALABAMA
	)	
Plaintiff,	)	
	)	AT LAW
VS.	)	
	)	
ROBERT DALTON ALLEN and	)	
MRS. SAMUEL ELLIS ALLEN,	)	NO. 76 85
	)	
Defendants.	)	

C O M P L A I N T

COUNT ONE

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Attorney for Plaintiff

FILED

AUG 22 1967

ALICE J. DUCK CLERK
REGISTER

204 Wilson Ave.
Prichard

received 22 day of Aug. 1967

day of 19

received copy of the within 84c

Robert Dalton Allen

Raymond E. Allen

service on

TAYLOR WILKINS, Sheriff

By

9-26-67

RETURNED

Not found in my County after due

gent set and inquiry.

RAY D. BRIDGES, Sheriff

RAY D. BRIDGES, Sheriff

AM

19, 1967 SEP 17 1967

RECEIVED
1967 SEP 17 1967

4400
4401
M. 7695

Virginia Stewart
minor etc.

U.S.

Robert Wallace Allen

and

Mrs. Samuel Lee Allen

FILED

AUG 22 1967

ALICE J. DICK
CLERK
REGISTER

J. R. Beard
Atty