

ELRINA E. MAYNARD,
Plaintiff,

VS.

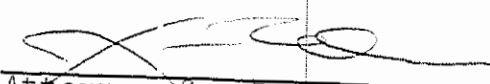
MRS. RAYMOND DILL and
RAYMOND DILL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 7766

Now come the defendants in the above styled cause and
for plea to the complaint heretofore filed in said cause say,
separately and severally:

1. Not guilty.


Attorney for Defendants

FILED

OCT 31 1967

ALICE J. BRYK CLERK
REGISTER

STATE OF ALABAMA

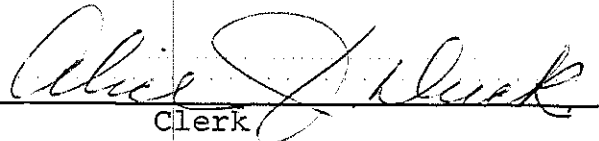
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mrs. Raymond Dill and Raymond Dill 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 Elrina E. Maynard.

Witness my hand this 29th day of September, 1967.


Clerk

ELRINA E. MAYNARD,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
MRS. RAYMOND DILL and	X	BALDWIN COUNTY, ALABAMA
RAYMOND DILL,	X	
Defendants.	X	AT LAW
	X	7766

COUNT ONE:

The Plaintiff claims of the Defendants Forty Thousand Dollars (\$40,000.00) as damages for that on, heretofore, to-wit: the 3rd day of September, 1967, the Defendant Mrs. Raymond Dill, who was then and there acting as the agent, servant or employee of the Defendant Raymond Dill and while acting within the line and scope of her employment as such so negligently operated an automobile on Baldwin County Highway No. 48 at a point four-tenths (.4) of a mile East of the Silverhill Community House in Baldwin County, Alabama, as to cause or allow the same to run into, upon

and against an automobile in which the Plaintiff was then and there riding and as a proximate consequence and result of the negligence of the Defendant Mrs. Raymond Dill, aforesaid, while acting within the line and scope of her employment as an agent, servant or employee of the Defendant Raymond Dill, the Plaintiff was seriously and permanently injured in this: she suffered a severe laceration to her forehead, she was caused to suffer shock, she bled profusely, she suffered great mental pain and anguish, she was made sick, sore and lame, she suffered multiple bruises about her body, she was caused to be hospitalized, she was caused to incur doctor and medical bills, her face and forehead are permanently scarred and disfigured and she will continue to suffer great mental pain and anguish for and on account of the scarring and disfigurement to her face and forehead; all to the damage to the Plaintiff, wherefore she brings this suit and asks judgment in the above amount.

CHASON, STONE & CHASON

By: 

Attorneys for Plaintiff

The Plaintiff demands a trial
of this cause by a jury.

CHASON, STONE & CHASON

By: 

Attorneys for Plaintiff

FILED

SEP 29 1967

ALICE J. DUCK CLERK
REGISTER

Defendants' Address for service:

Silverhill, Alabama

7766

ELRINA E. MAYNARD,

Plaintiff,

vs.

MRS. RAYMOND DILL and
RAYMOND DILL,

Selma Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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SUMMONS AND COMPLAINT

* * * * *

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

TAYLOR WILKINS, Sheriff

Carlisle Childress

Silverhill

120 miles at
1200
Total \$ 1200
TAYLOR WILKINS, Sheriff
Carlisle Childress
SHERIFF