

IONE C. HOWARD,

Plaintiff,

vs.

MARSHALL LEE VINSON
and GROVER PHILLIPI,

Defendants.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NUMBER: 8040

MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause, by her attorneys, and moves this Honorable Court to enter a Judgment by Default in favor of the Plaintiff and against the Defendants and as grounds therefor says as follows:

That the Defendants were served with a copy of the Complaint and a Summons on March 19, 1968 and they have failed to plead, answer or demur thereto since that time.

CHASON, STONE & CHASON

By: 

Attorneys for Plaintiff

FILED

JUN 26 1968

ALICE J. DUCK 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 MARSHALL LEE VINSON and GROVER PHILLIPI 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 IONE C. HOWARD.

Witness my hand this 14 day of March, 1968.

Alice J. [Signature]
Clerk

IONE C. HOWARD,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

MARSHALL LEE VINSON
and GROVER PHILLIPI,

X

AT LAW

Defendants.

X

X

COUNT ONE:

The Plaintiff claims of the Defendants Ten Thousand Dollars (\$10,000.00) as damages for that on heretofore, to-wit: the second day of December, 1967, the Defendant Marshall Lee Vinson, who was then and there acting as the agent, servant or employee of the Defendant Grover Phillipi, so negligently operated a motor vehicle on U.S. Highway 31 in Baldwin County, Alabama approximately three-fourths of a mile South of the city limits of Bay Minette, Baldwin County, Alabama, as to cause or allow the same to run into, upon and against an automobile being then and there operated by the Plaintiff and as a proximate consequence and

result of the negligence of the Defendant Marshall Lee Vinson
aforesaid, while acting within the line and scope of his employ-
ment as the agent, servant or employee of the Defendant Grover
Phillipi, the Plaintiff suffered severe and permanent personal
injuries in this: She received a cut across her nose and over
her right eye, she received a cut across her knee, her chest was
bruised, she was permanently disfigured and scarred, she suffered
and continues to suffer great mental pain and anguish, she was
made sick, sore and lame, she was caused to incur medical and
hospital bills in and about the care and treatment of her wounds,
and she was otherwise injured, 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

MAR 14 1968

The Defendants both reside in
Bay Minette, Alabama

ALICE J. DUCK CLERK
REGISTER

15 day of March 1968
19 day of March 1968

8040

Marshall Lee Vinson
Grover Phillippi Baker

IONE C. HOWARD,

Plaintiff,

vs.

MARSHALL LEE VINSON and
GROVER PHILLIPI,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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SUMMONS AND COMPLAINT

* * * * *

FILED

MAR 14 1968

ALICE J. DUCK CLERK
REGISTER
CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

TAYLOR WILKINS, Sheriff
W. A. Telford
White house Fork
and Baker

Sheriff claims 37 miles
Ten Cents per mile Total \$ 3.29
TAYLOR WILKINS, Sheriff
BY *[Signature]*
DEPUTY SHERIFF

We, the jury, find for the
Plaintiff and assess her damages
at \$ 6000.00

[Signature]
As Foreman