

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Andrew J. Hoover 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 Velma Lipscomb.

WITNESS my hand this 21st day of March, 1968.

*Alfred J. Quirk*  
Clerk

The defendant resides in Foley, Alabama.

\* \* \* \* \*

VELMA LIPSCOMB,  
Plaintiff,  
VS.  
ANDREW J. HOOVER,  
Defendant.

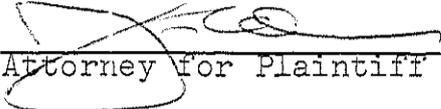
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

8054

C O M P L A I N T  
COUNT ONE

The plaintiff claims of the defendant the sum of Ten Thousand Dollars (\$10,000.00) for that heretofore on to-wit, March 24, 1967, at a point on U. S. Highway 98, which is 2.4 miles West of the city limits of Foley in Baldwin County, Alabama, and which point is also at the intersection of U. S. Highway 98 and Cemetery Road, the defendant so negligently operated a motor vehicle so as to cause it to run into, upon or against the motor vehicle in which plaintiff was driving and as a proximate result of the negligence of the said defendant the plaintiff was injured as follows: she suffered a severe cervical strain and was hospitalized from March 24, 1967, until April 5, 1967, as a result thereof; she was made sick, sore and extremely nervous and was put to much time, expense and inconvenience in and about the treatment

of her said injuries; she suffered and continues to suffer extreme mental anguish as a result thereof. Plaintiff avers that all of her injuries and damages were caused as a proximate result of the negligence of the defendant as aforesaid, hence this suit.

  
Attorney for Plaintiff

**FILED**

MAR 21 1968

**ALICE J. DUCK** CLERK  
REGISTER

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E413-26-68

CASE NO. 8054

VELMA LIPSCOMB,

Plaintiff,

vs:

ANDREW J. HOOVER,

Defendant.

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

James R. Owen, Attorney

Received 21 day of Nov 1888  
and on 26 day of March 1989  
I served a copy of the within 29 C  
on Andrew J. Hoover  
By service on Andrew J. Hoover

TAYLOR WILKINS, Sheriff

By Jim Eastman  
Foley, Ala.

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA. CLAIM \$1.50 EACH

FOR SERVING 1 PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$ 7.20  
PROCESS(ES) OR A TOTAL OF \$ 8.70