

ROBERT E. McDONALD, JR.

ATTORNEY AT LAW

25TH FLOOR

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA 36602

TELEPHONE 433-7393

September 20, 1968

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

8339

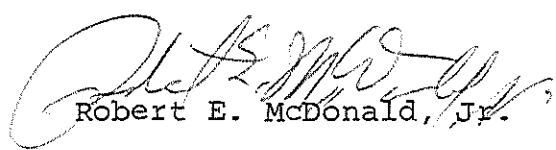
Re: Mamye L. Taylor
Vs. Minnie Rigsby Johnson

Dear Mrs. Duck:

Enclosed herewith is an original Bill of Complaint with
copies which I wish to file in your Court.

Thank you very much.

Yours very truly,


Robert E. McDonald, Jr.

REM/fgw

Enc.

MAMYE L. TAYLOR,)	IN THE CIRCUIT COURT
Plaintiff,)	OF BALDWIN COUNTY, ALABAMA
Vs.)	
MINNIE RIGSBY JOHNSON,)	
Defendant.)	CASE NO. <u>8339</u>

BILL OF COMPLAINT

COUNT I

Plaintiff claims of the defendant, the sum of THIRTY THOUSAND AND NO/100 (\$30,000.00) DOLLARS, damages, for that heretofore, on to-wit, July 24, 1967, the defendant was operating an automobile on Highway 31, at or near its intersection with D'Olive Street, the aforesaid streets being public streets in the City of Bay Minette, County of Baldwin, State of Alabama, and at the aforesaid time and place, the plaintiff was a passenger in said automobile, and at the aforesaid time and place, the defendant did so wantonly and recklessly operate said automobile as to cause said automobile to run into, run upon, collide with, or otherwise come in contact with another automobile, and as a proximate result of the aforesaid wantonness or recklessness of the defendant, the plaintiff was severely and wantonly injured as follows:

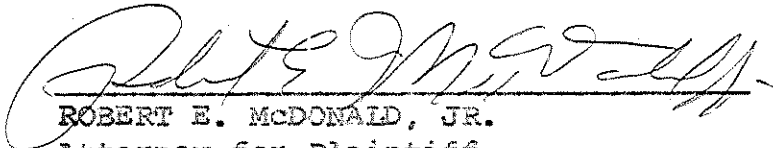
She was bruised, contused and suffered abrasions, she suffered injuries to her back and shoulders, she was forced in incur hospital bills, medical expenses, doctor bills, and plaintiff has been unable to work and has suffered a loss of wages, and plaintiff alleges she has been severely and permanently injured as aforesaid, all as a direct and proximate result of the aforesaid wantonness or recklessness of the defendant, and plaintiff further claims punitive damages.

COUNT II

Plaintiff claims of the defendant the sum of THIRTY THOUSAND AND NO/100 (\$30,000.00) DOLLARS, damages, for that heretofore on to-wit, July 24, 1967, the plaintiff was a guest riding in the defendant's car, which was driven by her, on Highway 31, at or near its intersection with D'Olive Street, the aforesaid highway and street being public streets in the City of Bay Minette, County of Baldwin, State of Alabama, and that at the aforesaid time and place, defendant wantonly injured the plaintiff by causing her automobile to run into, upon or to otherwise come in contact with another automobile which was being driven on the aforesaid Highway 31, and thereby injuring the plaintiff as follows:

Plaintiff was severely bruised, contused and suffered abrasions, she suffered injuries to her back and shoulders, plaintiff alleges she has been permanently injured, and plaintiff by reason of the aforesaid injuries, has been forced to incur hospital expenses, medical expenses, and doctor bills, and plaintiff has been unable to work and has suffered a loss of wages, plaintiff alleges she has been severely and permanently injured as aforesaid, and that she suffered all of said injuries and damages as aforesaid as a proximate wanton act herein complained of. Plaintiff also claims punitive damages.

Hence plaintiff brings this suit and asks judgment in the above amount.


ROBERT E. McDONALD, JR.
Attorney for Plaintiff

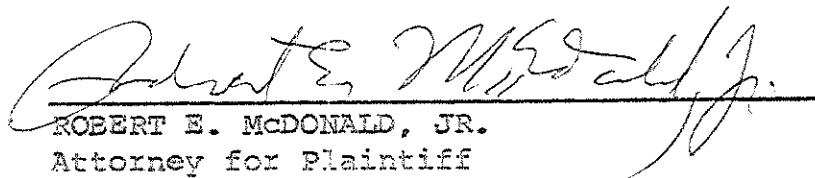
FILED

SEP 24 1968

ALICE J. DUCK

CLERK
REGISTER

Plaintiff respectfully demands a trial by jury.


ROBERT E. McDONALD, JR.
Attorney for Plaintiff

Defendant may be served at the following address:

1213 Pecan Street
Bay Minette, Alabama

FILED

SEP 24 1968

ALICE J. DUCK CLERK
REGISTER

MAMYE L. TAYLOR,) IN THE CIRCUIT COURT
 Plaintiff,) OF BALDWIN COUNTY, ALABAMA
 Vs.)
 MINNIE RIGSBY JOHNSON,)
 Defendant.) CASE NO. 8339

BILL OF COMPLAINT

COUNT I

Plaintiff claims of the defendant, the sum of THIRTY THOUSAND AND NO/100 (\$30,000.00) DOLLARS, damages, for that heretofore, on to-wit, July 24, 1967, the defendant was operating an automobile on Highway 31, at or near its intersection with D'Olive Street, the aforesaid streets being public streets in the City of Bay Minette, County of Baldwin, State of Alabama, and at the aforesaid time and place, the plaintiff was a passenger in said automobile, and at the aforesaid time and place, the defendant did so wantonly and recklessly operate said automobile as to cause said automobile to run into, run upon, collide with, or otherwise come in contact with another automobile, and as a proximate result of the aforesaid wantonness or recklessness of the defendant, the plaintiff was severely and wantonly injured as follows:


She was bruised, contused and suffered abrasions, she suffered injuries to her back and shoulders, she was forced to incur hospital bills, medical expenses, doctor bills, and plaintiff has been unable to work and has suffered a loss of wages, and plaintiff alleges she has been severely and permanently injured as aforesaid, all as a direct and proximate result of the aforesaid wantonness or recklessness of the defendant, and plaintiff further claims punitive damages.

COUNT II

Plaintiff claims of the defendant the sum of THIRTY THOUSAND AND NO/100 (\$30,000.00) DOLLARS, damages, for that heretofore on to-wit, July 24, 1967, the plaintiff was a guest riding in the defendant's car, which was driven by her, on Highway 31, at or near its intersection with D'Olive Street, the aforesaid highway and street being public streets in the City of Bay Minette, County of Baldwin, State of Alabama, and that at the aforesaid time and place, defendant wantonly injured the plaintiff by causing her automobile to run into, upon or to otherwise come in contact with another automobile which was being driven on the aforesaid Highway 31, and thereby injuring the plaintiff as follows:

Plaintiff was severely bruised, contused and suffered abrasions, she suffered injuries to her back and shoulders, plaintiff alleges she has been permanently injured, and plaintiff by reason of the aforesaid injuries, has been forced to incur hospital expenses, medical expenses, and doctor bills, and plaintiff has been unable to work and has suffered a loss of wages, plaintiff alleges she has been severely and permanently injured as aforesaid, and that she suffered all of said injuries and damages as aforesaid as a proximate wanton act herein complained of. Plaintiff also claims punitive damages.

Hence plaintiff brings this suit and asks judgment in the above amount.

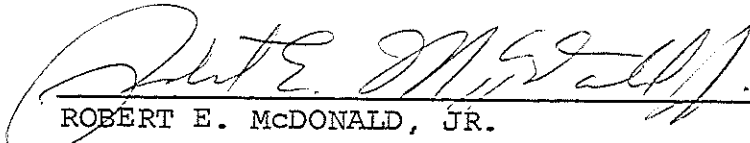

ROBERT E. McDONALD, JR.
Attorney for Plaintiff

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Plaintiff respectfully demands a trial by jury.


ROBERT E. McDONALD, JR.
Attorney for Plaintiff

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1213 Pecan Street
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REGISTER

284

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 8339

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Minnie Rigsby Johnson

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.....

Minnie Rigsby Johnson Defendant.....

by Manye L. Taylor

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

Witness my hand this 24th day of September 1968

Alice J. Luck Clerk

24-18-68

No. 8339

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MAMYE L. TAYLOR

Plaintiffs

vs.

MINNIE RIGSBY JOHNSON

Defendants

SUMMONS AND COMPLAINT

Filed September 24, 1968

Alice J. Duck Clerk

Robert E. McDonald, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

SEP 24 1968

Received In Office

THOMAS WILKINS

SHERIFF

19.....

Sheriff

I have executed this summons

this OCTOBER 18 1968

by leaving a copy with

MINNIE RIGSBY JOHNSON

Sheriff

Deputy Sheriff