

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 Michael W. Baldwin, individually and doing business as Baldwin Supply Company, and James William Hileman 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, Alabama, At Law, by Lisa Helton, a minor, suing herein by Ronald Helton, as her father and next friend.

Witness my hand this 30 day of July, 1969.

Rebecca Duck
Clerk

LISA HELTON, a minor, X
suing herein by Ronald Helton X
as her father and next X
friend, X

Plaintiff, X

vs. X

MICHAEL W. BALDWIN, X
individually and doing X
business as BALDWIN SUPPLY X
COMPANY, and JAMES WILLIAM X
HILEMAN, X

Defendants. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

70.8826

COUNT ONE:

The Plaintiff, Lisa Helton, a minor suing by her father and next friend, Ronald Helton, claims of the Defendant Ten Thousand Dollars (\$10,000.00) as damages for that on heretofore, to-wit: the 8th day of January, 1969, the Defendant, James William Hileman, the agent, servant or employee of the Defendant, Michael W. Baldwin,

individually and doing business as Baldwin Supply Company, who was then and there acting within the line and scope of his agency and employment as such, so negligently operated a motor vehicle on Alabama Highway 182 at a point 7.7 miles East of the center of Gulf Shores, Baldwin County, Alabama, as to cause or allow the same to swerve into the path of or in front of an automobile in which the Plaintiff was a passenger thereby forcing and causing the said car in which the Plaintiff was riding as a passenger to leave the roadway upon which it was traveling and to overturn and as a proximate result and consequence of the negligence of the Defendant, James William Hileman, aforesaid, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant, Michael W. Baldwin, individually and doing business as Baldwin Supply Company, the Plaintiff sustained serious personal injuries in this, to-wit: her mouth and lips were cut and torn, the back of her neck sustained a severe abrasion, she received bruises, contusions and lacerations over her entire body, she was made sick, sore and lame, she was made extremely nervous, she was caused to suffer and continues to suffer great mental and physical pain and anguish all to her damage aforesaid, hence this suit.

COUNT TWO:

The Plaintiff, Lisa Helton, a minor suing by her father and next friend, Ronald Helton, claims of the Defendant Ten Thousand Dollars (\$10,000.00) as damages for that on heretofore, to-wit: the 8th day of January, 1969, on Alabama Highway 182 at a point 7.7 miles East of the center of Gulf Shores, Baldwin County, Alabama, the Defendant, James William Hileman, the agent, servant or employee of the Defendant, Michael W. Baldwin, individually and doing business as Baldwin Supply Company, who was then and there acting within the line and scope of his agency and employment as such, wantonly injured the Plaintiff by then and there willfully and wantonly operating a motor vehicle so as to cause or allow the same

to swerve into the path of or in front of an automobile in which the Plaintiff was a passenger, thereby forcing and causing the said car in which the Plaintiff was riding as a passenger to leave the roadway upon which it was traveling and to overturn, and as a proximate consequence and result of the willful and wanton conduct of the Defendants aforesaid, the Plaintiff was injured in this, to-wit: her mouth and lips were cut and torn, the back of her neck sustained a severe abrasion, she received bruises, contusions and lacerations over her entire body, she was made sick, sore and lame, she was made extremely nervous, she was caused to suffer and continues to suffer great mental and physical pain and anguish all to her damage aforesaid, hence this suit.

CHASON, STONE & CHASON

By: Edward E. Ball
Attorneys for Plaintiff

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

CHASON, STONE & CHASON

By: Edward E. Ball

DEFENDANTS MAY BE SERVED AT
ROBERTSDALE, ALABAMA.

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 Michael W. Baldwin, individually and doing business as Baldwin Supply Company, and James William Hileman 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, Alabama, At Law, by Lisa Helton, a minor, suing herein by Ronald Helton, as her father and next friend.

Witness my hand this 30 day of July, 1969.

Reece J. Duck
Clerk

LISA HELTON, a minor,
suing herein by Ronald Helton
as her father and next
friend,

Plaintiff,

vs.

MICHAEL W. BALDWIN,
individually and doing
business as BALDWIN SUPPLY
COMPANY, and JAMES WILLIAM
HILEMAN,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

700.8426

COUNT ONE:

The Plaintiff, Lisa Helton, a minor suing by her father and next friend, Ronald Helton, claims of the Defendant Ten Thousand Dollars (\$10,000.00) as damages for that on heretofore, to-wit: the 8th day of January, 1969, the Defendant, James William Hileman, the agent, servant or employee of the Defendant, Michael W. Baldwin,

individually and doing business as Baldwin Supply Company, who was then and there acting within the line and scope of his agency and employment as such, so negligently operated a motor vehicle on Alabama Highway 182 at a point 7.7 miles East of the center of Gulf Shores, Baldwin County, Alabama, as to cause or allow the same to swerve into the path of or in front of an automobile in which the Plaintiff was a passenger thereby forcing and causing the said car in which the Plaintiff was riding as a passenger to leave the roadway upon which it was traveling and to overturn and as a proximate result and consequence of the negligence of the Defendant, James William Hileman, aforesaid, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant, Michael W. Baldwin, individually and doing business as Baldwin Supply Company, the Plaintiff sustained serious personal injuries in this, to-wit: her mouth and lips were cut and torn, the back of her neck sustained a severe abrasion, she received bruises, contusions and lacerations over her entire body, she was made sick, sore and lame, she was made extremely nervous, she was caused to suffer and continues to suffer great mental and physical pain and anguish all to her damage aforesaid, hence this suit.

COUNT TWO:

The Plaintiff, Lisa Helton, a minor suing by her father and next friend, Ronald Helton, claims of the Defendant Ten Thousand Dollars (\$10,000.00) as damages for that on heretofore, to-wit: the 8th day of January, 1969, on Alabama Highway 182 at a point 7.7 miles East of the center of Gulf Shores, Baldwin County, Alabama, the Defendant, James William Hileman, the agent, servant or employee of the Defendant, Michael W. Baldwin, individually and doing business as Baldwin Supply Company, who was then and there acting within the line and scope of his agency and employment as such, wantonly injured the Plaintiff by then and there willfully and wantonly operating a motor vehicle so as to cause or allow the same

to swerve into the path of or in front of an automobile in which the Plaintiff was a passenger, thereby forcing and causing the said car in which the Plaintiff was riding as a passenger to leave the roadway upon which it was traveling and to overturn, and as a proximate consequence and result of the willful and wanton conduct of the Defendants aforesaid, the Plaintiff was injured in this, to-wit: her mouth and lips were cut and torn, the back of her neck sustained a severe abrasion, she received bruises, contusions and lacerations over her entire body, she was made sick, sore and lame, she was made extremely nervous, she was caused to suffer and continues to suffer great mental and physical pain and anguish all to her damage aforesaid, hence this suit.

CHASON, STONE & CHASON

By: Edward E Ball
Attorneys for Plaintiff

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

CHASON, STONE & CHASON

By: Edward E Ball

DEFENDANTS MAY BE SERVED AT
ROBERTSDALE, ALABAMA.

FILED

JUL 30 1969

ALICE J. BENTLEY

LISA HELTON, a minor,
suing herein by Ronald Helton
as her father and next
friend,

Plaintiff,

vs.

MICHAEL W. BALDWIN,
individually and doing
business as BALDWIN SUPPLY
COMPANY, and JAMES WILLIAM
HILEMAN,

Defendants.

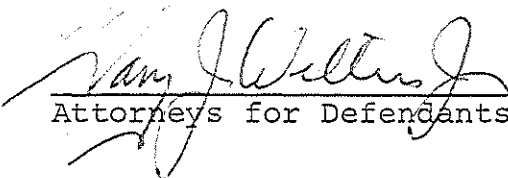
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Come the Defendants in the above styled cause and for
plea to the amended Complaint filed in said cause and say:

1. Not guilty.


Attorneys for Defendants

FILED

DEC 29 1969

ALICE J. DUCK CLERK
REGISTER

LISA HELTON, a minor,
suing herein by Ronald Helton
as her father and next
friend,

Plaintiff,

vs.

MICHAEL W. BALDWIN,
individually and doing
business as BALDWIN SUPPLY
COMPANY, and JAMES WILLIAM
HILEMAN,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

AMENDED COMPLAINT

The Plaintiff, Lisa Helton, a minor suing by her father and next friend, Ronald Helton, claims of the Defendant Five Hundred Dollars (\$500.00) as damages for that on heretofore, to-wit: the 8th day of January, 1969, the Defendant, James William Hileman, the agent, servant or employee of the Defendant, Michael W. Baldwin, individually and doing business as Baldwin Supply Company, who was then and there acting within the line and scope of his agency and employment as such, so negligently operated a motor vehicle on Alabama Highway 182, a public road, at a point 7.7 miles East of the center of Gulf Shores, Baldwin County, Alabama, as to cause or allow the same to swerve into the path of or in front of an automobile in which the Plaintiff was a passenger thereby forcing and causing the said car in which the Plaintiff was riding as a passenger to leave the roadway upon which it was traveling and to overturn and as a proximate result and consequence of the negligence of the Defendant, James William Hileman, aforesaid, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant, Michael W. Baldwin, individually and doing business as Baldwin Supply Company, the Plaintiff sustained serious personal injuries in this, to-wit: her mouth and lips were cut and torn, the back of her neck sustained a severe abrasion,

she received bruises, contusions and lacerations over her entire body, she was made sick, sore and lame, she was caused to suffer great mental and physical pain and anguish all to her damage aforesaid, hence this suit.

CHASON, STONE & CHASON

By Eberhard E Ball
Attorneys for Plaintiff

The Plaintiff hereby withdraws
the demand for jury trial heretofore
made in this cause.

CHASON, STONE & CHASON

By: Eberhard E Ball
Attorneys for Plaintiff

FILED

DEC 29 1969

ALICE J. DUCK CLERK
REGISTER

red 31 day of July 19 69
and on 1st day of August 19 69
I served a copy of the within etc
on Michael W. Baldwin 8-1-69
~~James William Hileman~~
By service on _____

TAYLOR WILKINS, Sheriff
By Hall D. S.
Robert Dale 50 mi
Returned 4 day of August 19 69
Not found in my county after diligent search and in-
quiry. so to James William Hileman
Taylor Wilkins, Sheriff
By Hall Deputy Sheriff

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Hall DEPUTY SHERIFF

WV. 8826

LISA HELTON, a minor, suing herein
by Ronald Helton as her father and
next friend,

Plaintiff,

vs.

MICHAEL W. BALDWIN, individually
and doing business as BALDWIN
SUPPLY COMPANY, and JAMES WILLIAM
HILEMAN,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED

JUL 30 1969

CLERK
REGISTER

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