

701
BERTHA C. COONEY,

PLAINTIFF

IN THE CIRCUIT COURT

VS.

OF

TOM SCHAFARZEK and
MRS. TOM SCHAFARZEK,

BALDWIN COUNTY, ALABAMA

DEFENDANTS

COUNT ONE

Plaintiff claims of the defendants the sum of Ten Thousand (\$10,000.00) Dollars damages for that heretofore on, to-wit, November 27th, 1940, the defendants while driving an automobile on Fairhope Avenue at its intersection with Church Street, both streets being public highways in the City of Fairhope, County of Baldwin, State of Alabama, negligently ran said automobile on, upon, or against the plaintiff, who was then and there crossing the said intersection of said streets above mentioned, and as a direct result and proximate consequence of the negligence of the defendants aforesaid, the plaintiff was severely bruised about her body and head, her leg was broken and she was otherwise injured. She was cut about the body, face, arms and legs and was caused to bleed and suffered severe pain and mental anguish and was confined to a hospital for a long period of time, all to her damages aforesaid, HENCE THIS SUIT.

COUNT TWO

The Plaintiff claims of the defendants the further sum of Ten Thousand (\$10,000.00) Dollars damages for that heretofore on, to-wit, November 27th, 1940, the defendants, while operating an automobile on Fairhope Avenue at its intersection with Church Street, both of said streets being public highways in the City of Fairhope, County of Baldwin, State of Alabama, wilfully or wantonly injured the plaintiff by then and there wilfully or wantonly driving their automobile on, upon or against the plaintiff, who was then and there crossing the said intersection of said streets above mentioned, and as a direct result and proximate consequence of said wilfulness and wantonness of the defendants aforesaid, the plaintiff was severely bruised about her body and head, her leg was broken and she was otherwise injured. She was cut about the body, face, arms and legs and was caused to bleed and suffer severe pain and mental anguish and was confined to a hospital for a long period of time, all in the sum aforesaid, HENCE THIS SUIT.

C. A. R.

J. B. R.
ATTORNEY FOR PLAINTIFF C. A. R.

Plaintiff demands trial of said ca. so by a jury.

C. A. R.

J. B. R.
ATTORNEY FOR PLAINTIFF C. A. R.

Address of Defendants

Copy

BERTHA C. COONEY,
PLAINTIFF.

-VS-

TOM SCHAFARZEK and
MRS. TOM SCHAFARZEK,
DEFENDANTS.

BILL OF COMPLAINT

Filed September 8 1941
R. S. Bush, Clerk

ORVIS M. BROWN
ATTORNEY-AT-LAW
ROBERTSDALE, ALABAMA

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

NO. 701 - -CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon TOM SCHAFARZEK and
MRS. TOM SCHAFARZEK, of Baldwin County, 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, by BERTHA C. COONEY, Plaintiff, against TOM SCHAFARZEK
and MRS. TOM SCHAFARZEK, Defendants.

WITNESS my hand this 8th day of September, 1941.

R. S. Duck
Clerk, Circuit Court.

BERTHA C. COONEY,

PLAINTIFF

IN THE CIRCUIT COURT

VS.

OF

TOM SCHAFARICH and
MRS. TOM SCHAFARICH,

BALDWIN COUNTY, ALABAMA

DEFENDANTS

COUNT ONE

Plaintiff claims of the defendants the sum of Ten Thousand (\$10,000.00) Dollars damages for that heretofore on, to-wit, November 27th, 1940, the defendants while driving an automobile on Fairhope Avenue at its intersection with Church Street, both streets being public highways in the City of Fairhope, County of Baldwin, State of Alabama, negligently ran said automobile on, upon, or against the plaintiff, who was then and there crossing the said intersection of said streets above mentioned, and as a direct result and proximate consequence of the negligence of the defendants aforesaid, the plaintiff was severely bruised about her body and head, her leg was broken and she was otherwise injured. She was cut about the body, face, arms and legs and was caused to bleed and suffered severe pain and mental anguish and was confined to a hospital for a long period of time, all to her damages aforesaid, HENCE THIS SUIT.

COUNT TWO

The Plaintiff claims of the defendants the further sum of Ten Thousand (\$10,000.00) Dollars damages for that heretofore on, to-wit, November 27th, 1940, the defendants, while operating an automobile on Fairhope Avenue at its intersection with Church Street, both of said streets being public highways in the City of Fairhope, County of Baldwin, State of Alabama, wilfully or wantonly injured the plaintiff by them and there wilfully or wantonly driving their automobile on, upon or against the plaintiff, who was then and there crossing the said intersection of said streets above mentioned, and as a direct result and proximate consequence of said wilfulness and wantonness of the defendants aforesaid, the plaintiff was severely bruised about her body and head, her leg was broken and she was otherwise injured. She was cut about the body, face, arms and legs and was caused to bleed and suffer severe pain and mental anguish and was confined to a hospital for a long period of time, all in the sum aforesaid, HENCE THIS SUIT.

R. M. Bennett
J. G. Bennett
ATTORNEYS FOR PLAINTIFF *R. M. A.*

Plaintiff demands trial of said case by a jury.

R. M. Bennett
J. G. Bennett
ATTORNEYS FOR PLAINTIFF *R. M. A.*

Address of Defendants

copy

BERTHA C. COONEY,

PLAINTIFF.

-VS-

TOM SCHAFARZEK and
MRS. TOM SCHAFARZEK,

DEFENDANTS.

BILL OF COMPLAINT

*Filed September 8, 1941
R.E. Duck, Clerk*

ORVIS M. BROWN
ATTORNEY-AT-LAW
ROBERTSDALE, ALABAMA

THE STATE OF ALABAMA,
Baldwin County.

No. 701

CIRCUIT COURT

193

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon TOM SCHAFARZEV and MRS. TOMSCHAFARZEV

of Baldwin County

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against TOM SCHAFARZEV

Defendant .. by BERTHA C. COONEY

Plaintiff

Witness my hand this 8th day of September 1931

R. S. Dush

Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

BERTHA C. COONEY,

PLAINTIFF

VS.

TOM SCHAPARZEK and
MRS. TOM SCHAPARZEK,

DEFENDANTS

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA

COUNT ONE

Plaintiff claims of the defendants the sum of Ten Thousand (\$10,000.00) Dollars damages for that heretofore on, to-wit, November 27th, 1940, the defendants while driving an automobile on Fairhope Avenue at its intersection with Church Street, both streets being public highways in the City of Fairhope, County of Baldwin, State of Alabama, negligently ran said automobile on, upon, or against the plaintiff, who was then and there crossing the said intersection of said streets above mentioned, and as a direct result and proximate consequence of the negligence of the defendants aforesaid, the plaintiff was severely bruised about her body and head, her leg was broken and she was otherwise injured. She was cut about the body, face, arms and legs and was caused to bleed and suffered severe pain and mental anguish and was confined to a hospital for a long period of time, all to her damages aforesaid, HENCE THIS SUIT.

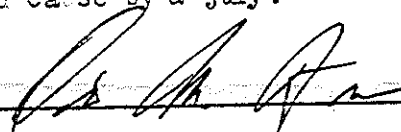
COUNT TWO

The Plaintiff claims of the defendants the further sum of Ten Thousand (\$10,000.00) Dollars damages for that heretofore on, to-wit, November 27th, 1940, the defendants, while operating an automobile on Fairhope Avenue at its intersection with Church Street, both of said streets being public highways in the City of Fairhope, County of Baldwin, State of Alabama, wilfully or wantonly injured the plaintiff by then and there wilfully or wantonly driving their automobile on, upon or against the plaintiff, who was then and there crossing the said intersection of said streets above mentioned, and as a direct result and proximate consequence of said wilfulness and wantonness of the defendants aforesaid, the plaintiff was severely bruised about her body and head, her leg was broken and she was otherwise injured. She was cut about the body, face, arms and legs and was caused to bleed and suffer severe pain and mental anguish and was confined to a hospital for a long period of time, all in the sum aforesaid, HENCE THIS SUIT.



ATTORNEYS FOR PLAINTIFF C. M. B.

Plaintiff demands trial of said cause by a jury.



ATTORNEYS FOR PLAINTIFF C. M. B.

Address of Defendants

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

NO. 701 - -CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon TOM SCHAFARZEK and
MRS. TOM SCHAFARZEK, of Baldwin County, 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, by BERTHA C. COONEY, Plaintiff, against TOM SCHAFARZEK
and MRS. TOM SCHAFARZEK, Defendants.

WITNESS my hand this 8th day of September, 1941.

R. S. Rust
Clerk, Circuit Court.