IRENE WOLFE, : IN THE CIRCUIT COURT

Plaintiff, OF

Vs. : BALDWIN COUNTY, ALABAMA.

JOSEPH COLBERT CLEMMONS, : AT LAW.

Defendant, :

NO. / 1332

## COUMT I

The plaintiff claims of the defendant, to-wit, Fifteen Hundred (\$1500.00) Dollars as damages for that on, to-wit, the 13th day of March, 1949, the defendant wilfully or wantonly drove an automobile which he was operating on and along U. S. Highway 90, at a point about 150 feet West of the intersection of U. S. Highway 90 and U. S. Highway 31, in the County of Baldwin, State of Alabama, into, upon, over, or against an automobile in which the plaintiff was riding at said time and place, and as a proximate consequence and result of such wilfulness and wantonness of the defendant at said time and place, the plaintiff received severe personal injuries in this, to-wit; she received abrasions and bruises and cuts on or near the center of her forehead and nose and she was otherwise made sick, sore and lame, she suffered great mental anguish and physical pain; for all of which said injuries and damages the plaintiff claims damages as aforesaid; hence this suit.

## COUNT II

The plaintiff claims of the defendant, to-wit, Fifteen Hundred (\$1500.00) Dollars as damages for that on, to-wit, the 13th day of March 1949, the defendant so negligently drove an automobile which he was operating on and along U. S. Highway 90, at a point about 150 feet West of the intersection of U. S. Highway 90 and U. S. Highway 31, in the County of Baldwin, State of Alabama, as to cause the same to run into, upon, over or against an automobile in which plaintiff was riding at said time and place, and as a proximate consequence and result of such negligence on the part of the defendant at said time and place, the plaintiff

received severe personal injuries in this, to-wit; she received abrasions and bruises and cuts on or near the center of her forehead and nose and she was otherwise made sick, sore and lame, she suffered great mental anguish and physical pain; for all of which said injuries and damages the plaintiff claims damages as aforesaid; hence this suit.

Alexander Foreman, Jr., 207 First Mational Bank Bldg., Mobile 13, Alabama

Defendant's Address:

Summerdale, Alabama

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4-26 Page Defendant lives at THE STATE of ALABAMA, BALDWIN COUNTY RECEIVED IN OFFICE CIRCUIT COURT IRENE WOLFE Plaintiffs by leaving a copy with JOSEPH COLBERT CLEMMONS oxegh Callert Clemmans Defendants SUMMONS and COMPLAINT 4-11-49 Filed\_\_ Paylor Wilkerson Sheriff Heigh Steadhan Deputy Sheriff Plaintiff's Attorney Defendant's Attorney Moore Printing Co., Bay Minette, Ala.

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Judgment was render Irene Wolfe as Plaintiff and Joseph Colbert Cler vor of the said Plaintin	mmons  ff and against to	ander Fore	endant for the sum of	was Defend \$500.00  DOL	lant, i
Judgment was render  Irene Wolfe  as Plaintiff and  Joseph Colbert Clea  avor of the said Plaintiff and for the sum of \$1.500  the costs in said suit, and	mmons  ff and against to	ander Fore	endant for the sum of	erein was Defend	lant, i
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Judgment was render  Irene Wolfe  vas Plaintiff and  Joseph Colbert Clea  avor of the said Plaintif  nd for the sum of	mmons  ff and against to that Alex	ander Fore	endant for the sum of	was Defend \$500.00  DOL  neys of record for the Pl	lant, i

## CERTIFICATE OF JUDGMENT

Irene	Wolfe	***************************************
		, Plaintiff
: :	Vs.	, I lamini
Joseph	Colbert Clemmo	ons
		, Defendant

STATE OF ALABAMA :

COUNTY OF MOBILE :

Before me, the undersigned authority, personally appeared Elmer E. Wolfe, Jr., who, being by me first duly sworn, on oath deposes and says as follows:

That he is the plaintiff in that certain cause now pending in the Circuit Court of Baldwin County, Alabama, entitled Elmer E. Wolfe, Jr. vs. Joseph Colbert Clemmons; that he knows the defendant, Joseph Colbert Clemmons; that the said Joseph Dolbert Clemmons is not in the Armed Services of the United States of America, as contemplated by the Soldiers and Sailors Civil Relief Act, as the said Joseph Colbert Clemmons is a farmer who lives at Summerdale, Alabama.

Subscribed and sworn to before me, this stage of July, 1949.

Notary Public, Mobile County, Azabama

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