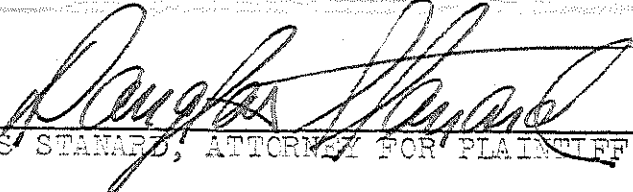


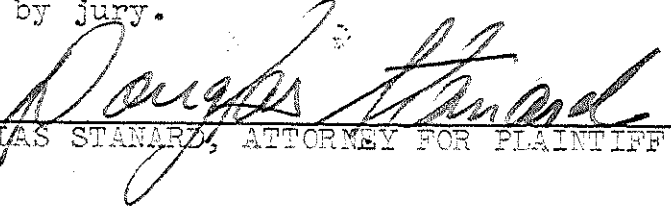
JESSIE MAE SLOCUM : IN THE CIRCUIT COURT OF
PLAINTIFF : BALDWIN COUNTY, ALABAMA
VS : AT LAW
ETHEL THOMAS : NO 1903
DEFENDANT :

COUNT ONE

The Plaintiff claims of the Defendant TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS as damages for that on, to-wit, the 8th day of December, 1952, the Defendant so negligently operated an automobile on Highway 89 near Barnwell, Alabama, being a public Highway in the State of Alabama, so as to cause or allow the said automobile which the said Defendant was driving to run into and collide with an automobile in which Plaintiff was riding; and as a proximate result of the negligence of the Defendant, Plaintiff suffered injuries and was caused and will continue to suffer great physical and mental pain, and she has incurred and will incur large expenses by way of doctor bills and medicine and as a further proximate result and consequence of the said negligence on behalf of the Defendant, Plaintiff's automobile was greatly broken, bent, bruised and damaged, the Plaintiff was caused thereby to pay out or become liable for large sums of money for parts and repairs for said automobile and the Plaintiff has been and will continue to be deprived of the use of her said automobile and thereby caused to expend much money in the hiring of a substitute automobile, all as a proximate consequence of the negligence of the Defendant as aforesaid, hence the Plaintiff claims damages aforesaid.


DOUGLAS STANARD, ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.


DOUGLAS STANARD, ATTORNEY FOR PLAINTIFF

Defendant can be served at:

Battles Warf, between Fairhope
and Point Clear, Alabama

DOUGLAS STANARD
LAWYER
904 First National Bank Building
MOBILE 13, ALABAMA

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SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1903

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ETHEL THOMAS

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

ETHEL THOMAS, Defendant

by JESSIE MAE SLOCUM

Plaintiff

Witness my hand this 19th day of January 1953

W. J. Duncanson, Clerk

RECORDED

No. 1903

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

JESSIE MAE SLOCUM

Plaintiffs

vs.

ETHEL THOMAS

Defendants

SUMMONS and COMPLAINT

Filed 1-19-53, 19

Arcis J. Leuch, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Jan. 19, 1953
Taylor W. Walker, Sheriff

I have executed this summons

this Feb. 4, 1953
by leaving a copy with

Ethel Thomas

Taylor W. Walker, Sheriff
G. F. Holford, Deputy Sheriff

DOUGLAS STANARD

LAWYER

904 FIRST NATIONAL BANK BUILDING

MOBILE 13, ALABAMA

PHONE 3-8692

January 17, 1953

Honorable Clerk of the
Circuit Court of Baldwin
County, Alabama
~~Civil Division~~
Bay Minette, Alabama

Re: Jessie Mae Slocum

-VS-

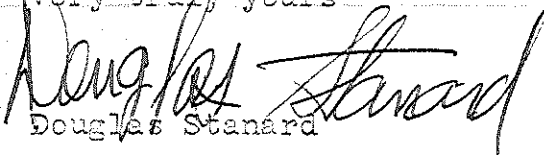
Ethel Thomas

Dear Sir:

Enclosed is a Complaint and Service Copy in the above styled case. I would certainly appreciate you acknowledging the receipt of same.

I would further appreciate your advising me if and when Service is perfected upon the Defendant.

Very truly yours


Douglas Stanard

Encl/ Complaint and Service Copy
DS/la

no 1903 Jury
Jessie Mae Slocum
vs.

Ethel Thomas

Damages

Filed 1-19-53

Douglas Standard