


LINDA HARRELL, a minor, suing : IN THE CIRCUIT COURT OF
by and through her Father and :
next friend, FRANCIS E. HARRELL, : BALDWIN COUNTY, ALABAMA
PLAINTIFF, : AT LAW
VS : NO 195-4
FRED C. GRIFFIN, :
DEFENDANT. :

AMENDMENT

Comes the Complainant with leave of Court first having been obtained and amends her original Complaint by adding the following count hereto:

COUNT TWO

Plaintiff claims of the Defendant FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS as damages for that heretofore on, to-wit, the 3rd day of February, 1953, the Defendant unlawfully parked or did leave standing a motor vehicle upon the paved portion of Highway number 3, North of Foley, Alabama, being a public Highway in the State of Alabama; and as a direct and proximate consequence thereof an automobile in which the Plaintiff was riding on said Highway at said time and place ran into another motor vehicle which was then and there travelling or standing on said Highway and Plaintiff avers that as a direct and proximate result of the said unlawful parking on the part of said Defendant as aforesaid, she was made sick, sore, lame and disabled, she suffered a severe concussion of her head or her brain, her body was bruised and contused, her face, forehead and head was cut, bruised and battered and permanently scarred, hence this suit.


ATTORNEY FOR PLAINTIFF


ATTORNEY FOR PLAINTIFF

Defendant can be served through his
Attorneys of Record, McCorvey, Turner, Rogers,
Johnstone & Adams, Merchants National Bank
Building, Mobile, Alabama.

1964

RECORDED

FILED

NOV 2 1953

ALICE L. DUCK, Clerk

LINDA HARRELL, suing by and	:	IN THE CIRCUIT COURT OF
through her Father and next	:	BALDWIN COUNTY, ALABAMA
friend, FRANCIS E. HARRELL,	:	
PLAINTIFF,	:	AT LAW
VS	:	NO _____
FRED C. GRIFFIN,	:	
DEFENDANT.	:	

AMENDMENT

Comes the Complainant with leave of Court first having been obtained and amends her original Complaint by changing the style of said Complaint to read as follows:

LINDA HARRELL, a minor, suing	:	IN THE CIRCUIT COURT OF
by and through her Father and	:	
next friend, FRANCIS E. HARRELL,	:	BALDWIN COUNTY, ALABAMA
PLAINTIFF,	:	AT LAW
VS	:	NO _____
FRED C. GRIFFIN,	:	
DEFENDANT.	:	



ATTORNEY FOR PLAINTIFF



ATTORNEY FOR PLAINTIFF

Defendant can be served through his
Attorneys of Record, McCorvey, Turner, Rogers,
Johnstone & Adams, Mobile, Alabama.

198-4

RECORDED

FILED

NOV 2 1953

ALICE J. DUCK, Clerk

NOV 2 1953

NOV 2 1953

RECEIVED
U.S. DEPARTMENT OF JUSTICE
NOV 2 1953

NOT RECORDED AND INDEXED BY THE CLERK OF THE COURT

RECEIVED
U.S. DEPARTMENT OF JUSTICE
NOV 2 1953

NOV 2 1953

NOV 2 1953

NOV 2 1953

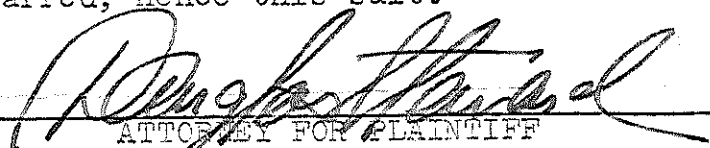
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NOV 2 1953

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U.S. DEPARTMENT OF JUSTICE
NOV 2 1953

LINDA HARRELL, suing by and : IN THE CIRCUIT COURT OF
 through her Father and next :
 friend, FRANCIS E. HARRELL, : BALDWIN COUNTY, ALABAMA
 PLAINTIFF : AT LAW
 VS : NO 1954
 FRED C. GRIFFIN :
 DEFENDANT :

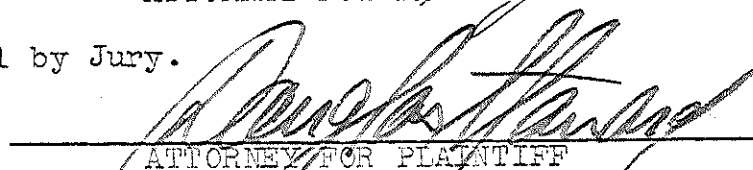
COUNT ONE

Plaintiff claims of the Defendant FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS as damages for that heretofore on, to-wit, the 3rd day of February, 1953, the Defendant unlawfully and in violation of Title 36, Section 25 of the Code of Alabama, 1940 or other violations of Law or of the rules of the road of the State of Alabama, parked or did leave standing a motor vehicle upon the paved portion of Highway number 3, North of Foley, Alabama, being a public Highway in the State of Alabama; And as a direct and proximate consequence thereof an automobile in which the Plaintiff was riding on said Highway at said time and place ran into another motor vehicle which was then and there travelling or standing on said Highway and Plaintiff avers that as a direct and proximate result of the said unlawful parking on the part of said Defendant as aforesaid, she was made sick, sore, lame and disabled, she suffered a severe concussion of her head or her brain, her body was bruised and contused, her face, forehead and head was cut, bruised and battered and permanently scarred, hence this suit.


 ATTORNEY FOR PLAINTIFF


 ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by Jury.


 ATTORNEY FOR PLAINTIFF


 ATTORNEY FOR PLAINTIFF

Defendant can be served at:
 Loxley, Alabama

1954

WFO 10/10/54

The Commission on the Status of Women, established in 1946, has been working to improve the status of women in all countries. It has held several sessions and has produced many reports and recommendations. The Commission has been very successful in its work and has been a major force in the advancement of women's rights.

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[Handwritten signatures and notes]

WFO 10/10/54

WFO 10/10/54

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1954

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Fred C. Griffin

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

Fred C. Griffin, Defendant

by Linda Harrell ~~by~~ suing by and through her Father and next friend, Frances

E. Harrell, Plaintiff

Witness my hand this 27th day of March 19 53

Linda Harrell, Clerk

RECORDED

No. 1954

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

LINDA HARRELL, suing by and through
her Father and next friend, Frances E.
Harrell

Plaintiffs

vs.

FRED C GRIFFIN

Defendants

SUMMONS and COMPLAINT

Filed 3-27-53, 19

Henry J. Hucker, Clerk

Plaintiff's Attorney

Defendant's Attorney

4-1-53

Defendant lives at

RECEIVED IN OFFICE

March 28, 1953
Taylor & Wilkins, Sheriff

I have executed this summons

this 4-1, 1953
by leaving a copy with

Fred C Griffin

Taylor Wilkins, Sheriff
Edmund Sturges, Deputy Sheriff

LINDA HARRELL, suing by and through her Father and next friend, FRANCIS E. HARRELL,
Plaintiff,
vs.
FRED C. GRIFFIN,
Defendant.

I
I
I
I
I
I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
NO. 1954

Comes the defendant in the above styled cause and moves to strike from plaintiff's complaint that part thereof of reading:

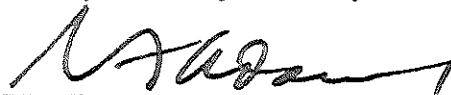
"or other violations of Law or of the rules of the road of the State of Alabama,"

on the following separate and several grounds:

1. Because said portion of the complaint is irrelevant.
2. Because said portion of the complaint makes the complaint prolix.
3. Because said portion of the complaint is so vague, indefinite and uncertain as to be an improper allegation.
4. Because said portion of the complaint does not provide defendant with particularity sufficient to enable him to know the charge against him upon which plaintiff will rely.
5. Because said portion of the complaint is frivolous.

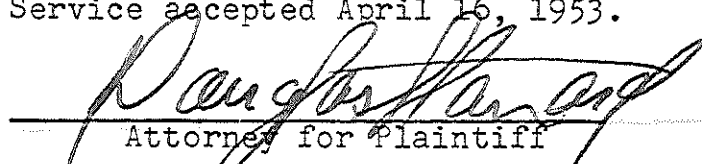
MCCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS

BY:



Attorneys for Defendant.

Service accepted April 16, 1953.



Attorney for Plaintiff

Bay Minette, Ala., 11/3, 1953

To the Sheriff of Mobile County,
Mobile, Alabama.

I enclose herewith Interrog to be served on M^r Conway,
Turner, Rogers, Johnston & Adams, Attorneys at
Mobile

Please serve and return as early as possible.

Taylor Wilkins
Sheriff Baldwin County Alabama.

(If not found in your county please advise promptly giving information as to present location if possible)

51921

RECORDED

FILED
APR 17 1962
APR 17 1962

MCCORMYK, TURNER, ROGERS, JOHNSON & ADAMS
ATTORNEYS AT LAW
NINTH FLOOR, MERCHANT NATIONAL BANK BUILDING
MOBILE, ALABAMA

LINDA HARRELL, a minor, suing : IN THE CIRCUIT COURT OF
by and through her Father and
next friend, FRANCIS E. HARRELL, : BALDWIN COUNTY, ALABAMA

PLAINTIFF, : AT LAW

VS : NO 1954

FRED C. GRIFFIN, :

DEFENDANT. :

INTERROGATORIES PROPOUNDED TO THE DEFENDANT, UNDER PROVISIONS
OF TITLE 7, SECTION 477, ET SEQ OF THE CODE OF ALABAMA OF 1940.

1. Please state your full and correct name.
2. On February 3, 1953 were you driving or riding in an automobile on Highway Number 3 North of Foley which was in a collision at approximately 10:40 P.M. on said Highway Number 3 at a point approximately three miles North of Foley, Alabama?
3. Who was in said automobile with you at said time and on said occasion?
4. If you were not driving said car, who was driving said car?
5. Was said car parked on the Highway?
6. In which direction were you travelling prior to the car being parked on the Highway?
7. Was "U" turn made in the Highway immediately prior to the car being parked on the Highway?
8. In which direction was the car that you parked headed on said Highway after coming to a stop?
9. In which lane was the automobile after the same came to a stop or after it was parked?
10. Who parked the car which you were driving or riding in on said Highway Number 3 at the spot where it was in a collision with some other automobiles?
11. Was your wife in the car with you immediately prior to the accident?
12. Did you remove the switch keys from the automobile after it was parked?

13. If you did remove the switch keys from the car, had said car come to a complete stop on the Highway?
14. If you removed the switch keys from said automobile immediately prior to the accident was the motor still running or had the motor been cut off?
15. Prior to making a "U" turn on said Highway Number 3, in which direction were you travelling.
16. After a "U" turn was made on Highway Number 3 did the car come to a stop in the wrong lane of traffic?
17. Is it true or not that the car came to a stop on the West side of Highway 3 headed North?
18. Is it true or not that the correct lane in which to travel North on Highway 3, at a point approximately 3 miles North of Foley is on the East side of lane of said Highway 3?
19. If it is so that you were travelling South on Highway 3 prior to making a "U" turn at a point approximately three miles North of Foley, then where was your destination.
20. Where was the last place where you had stopped in said automobile before the accident?
21. Name each and every place you had stopped or visited during a period of six hours prior to the time in which the automobile you were riding in was involved in an accident at a point approximately three miles North of Foley on February 3, 1953.
22. Had you had any intoxicating liquors to drink within a period of six hours prior to said accident?
23. If you had, then please name the places where you drank said intoxicating liquors and name the number of drinks and the variety of same which you had within a period of six hours prior to said car being involved in an accident on February 3, 1953 at 10:40 P.M. at a point about three miles North of Foley.
24. Had your wife been drinking within a period of six hours prior to the time of the accident. If so, how many drinks had she had and where did she drink them?
25. For what purpose was the "U" turn mentioned hereinabove made?

26. Where was your intended destination after having made said "U" turn as mentioned hereinabove.

27. Describe in what manner the "U" turn as mentioned hereinabove was effected.


ATTORNEY FOR PLAINTIFF


ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, the undersigned authority in and for said State and County, personally appeared Douglas Stanard, who being first duly sworn on oath, despoes and says that he is one of the attorneys for the Plaintiff in the above entitled cause; and that answers to the above and foregoing interrogatories, if well and truly made by the Defendant, will be material evidence for the Plaintiff, Linda Harrell, in this cause.


DOUGLAS STANARD

Subscribed and sworn to before me this the 31st day of October, 1953.


NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

Defendant's Attorneys of Record are:

McCorvey, Turner, Rogers, Johnstone & Adams.
Mobile, Alabama.

1954
RECORDED
Linda Harrell
15.

Received in Sheriff's Office
this 3 day of Nov, 1953
TAYLOR WILKINS, Sheriff

Fred C. Griffin
57

Interrogatories

9.7
B

serve on Monday
Lester, King, Martin
& Adams, attorneys

Robert
Adams

FILED
NOV 2 1953
ALICE L. DUCK, Clerk

EXECUTED
This 9 day of Nov 1953
by serving a copy of the within on
Robert Adams
W. H. HOLCOCK, Sheriff
Mobile County, Ala.
By: M. B. ... D.S.

DOUGLAS STANARD

LAWYER

904 FIRST NATIONAL BANK BUILDING

MOBILE 13, ALABAMA

PHONE 3-8692

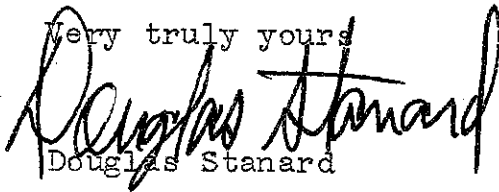
March 26, 1953

Hon. Clerk of the Circuit Court
of Baldwin County, Alabama
Bay Minette, Alabama

Dear Sir:

Enclosed is the Original and copy of Complaint. I
would more than appreciate it if you would acknowledge
receipt of same and also advise this office when service
is perfected against the Defendant.

Very truly yours



Douglas Stanard

Encl/ Complaint
DS/la

no 1954

~~Larry~~

Linda Harrell
by her next friend
Frances C. Harrell.

vs.

Fred C. Griffin

Damages
3-27-53-

Douglas Standard

THE STATE OF ALABAMA

Baldwin

County

PROBATE COURT.

LETTERS OF GUARDIANSHIP OVER THE ESTATE OF

Linda Harrell

, a minor, under the age of fourteen years,

, a minor, the age of fourteen years,

, a minor, the age of fourteen years,

, a minor, the age of fourteen years,

, a minor, the age of fourteen years,

are hereby granted to Francis E. Harrell, who has duly qualified and given bond as required by law, and is authorized to discharge all the functions attached to said guardianship.

Dated this 27th day of February, A.D. 1954.

Code 1940—Tit. 21, Sec.1.

/s/ W. R. Stuart, Judge of Probate.

THE STATE OF ALABAMA

Baldwin

County

I, W. R. Stuart, Judge of Probate in and for said County and State, hereby certify that the within and foregoing is a true, correct and complete copy of the Letters of Guardianship issued to Francis E. Harrell as Guardian of the estate of Linda Harrell as same appears of record in my office and same are in full force and effect.

Given under my hand and seal of office, this the 4th day of March, 1954.

W. R. Stuart
Judge of Probate.

No. _____
THE STATE OF ALABAMA
County _____
PROBATE COURT
ESTATE OF
LETTERS OF GUARDIANSHIP TO

FILED MAR 10 1954