

LINDA HARRELL, a minor, suing	:	IN THE CIRCUIT COURT OF
by and through her Father and	:	
next friend, FRANCIS E. HARRELL,	:	BAIDWIN COUNTY, ALABAMA
PLAINTIFF,	:	AT LAW
VS	:	NO <u>1957</u>
JUANITA GRIFFIN,	:	
DEFENDANT.	:	

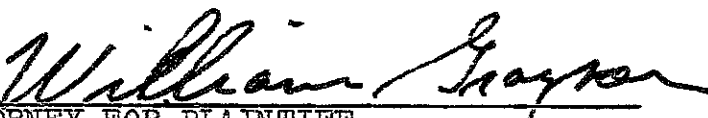
AMENDMENT

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 her  
Attorneys of Record, McCorvey, Turner, Rogers,  
Johnstone & Adams, Merchants National Bank  
Building, Mobile, Alabama.

1957

RECEIVED  
NOV 2 1953  
U.S. DEPT. OF JUSTICE

FILED

NOV 2 1953

ALICE L. BUCK, Clerk


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 \_\_\_\_\_  
 JUANITA 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 \_\_\_\_\_  
 JUANITA GRIFFIN, :  
 DEFENDANT. :

  
 ATTORNEY FOR PLAINTIFF

  
 ATTORNEY FOR PLAINTIFF

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

1957

RECORDED

FILED

NOV 2 1953

ALICE J. 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 <u>1957</u>
JUANITA 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 husband in the car with you immediately prior to the accident?
12. Did your husband remove the keys from the automobile after it was parked?

13. If your husband did remove the keys from the car, had said car come to a complete stop on the Highway?
14. If your husband removed the 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 husband been drinking within a period of six hours prior to the time of the accident. If so, how many drinks had he had and where did he 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.

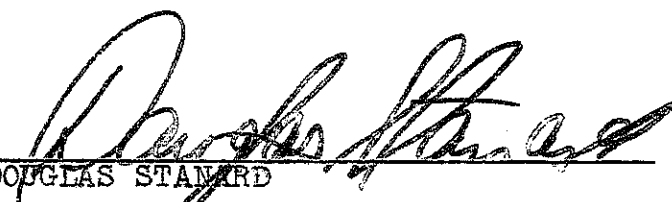
27. Describe in what manner the "U" turn as mentioned hereinabove was effected.

  
ATTORNEY FOR PLAINTIFF

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, deposes 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 28th day of August, 1953.

  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

Received in Sheriff's Office  
this 3 day of Sept 1953  
TAMM & WILKINS, et al

CP 85 400  
Mc Carney Durner Rogers  
etc

54  
B

RECORDED 1953 400  
Linda Hall

vs.  
Juanita Griffin

Interrogatories

Robert Adams

EXECUTED

This 5 day of Sept 1953  
by serving a copy of the within on

Robert Adams

W. H. HOLCOMBE, Sheriff  
Mobile County, Ala.

By: M. Bernstein

FILED

SEP 1 1953

ALICE J. DUCK, Clerk



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

I  
I IN THE CIRCUIT COURT OF  
I BALDWIN COUNTY, ALABAMA  
I AT LAW  
I NO. 1957  
I

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:

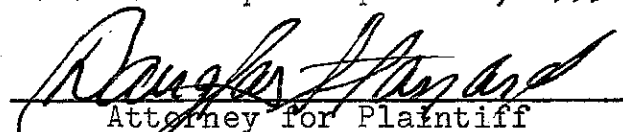
1. Because said portion of the complaint is irrelevant.
2. Because said portion of the complaint makes the complaint prolix.
3. Because said portion of the complaint is so vague, indefinite and uncertain as to be an improper allegation.
4. Because said portion of the complaint does not provide defendant 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

RECORDED

MCCORMICK, TURNER, ROGERS, JOHNSTON & ADAMS

ATTORNEYS AT LAW

MOBILE BRANCH, MORGAN NATIONAL BANK BUILDING

MOBILE, ALABAMA

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 1957  
JUANITA 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

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1957

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon-----

Juanita Griffie

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 -----

Juanita Griffie

Defendant-----

by Linda Harrell, suing by and through  
her father & next friend, Frances Harrell, Plaintiff-----

Witness my hand this

1st

day of

April

1953

Arling J. Leucke, Clerk

RECORDED

No. 1957

Page \_\_\_\_\_

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Linda Farrell, suing  
by and through her father  
Francis Farrell Plaintiff  
vs.

Juanita Griffin  
Defendants

SUMMONS and COMPLAINT

Filed 4-1, 19 53

Reidy French Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at \_\_\_\_\_

RECEIVED IN OFFICE

April 7, 19 53  
Taylor Wilkins Sheriff

I have executed this summons  
this April 7, 19 53  
by leaving a copy with

Juanita Griffin

Taylor Wilkins Sheriff  
H. F. Hall Deputy Sheriff  
Madison P. S.

DOUGLAS STANARD  
LAWYER  
904 FIRST NATIONAL BANK BUILDING  
MOBILE 13, ALABAMA

PHONE 3-8692

March 31, 1953

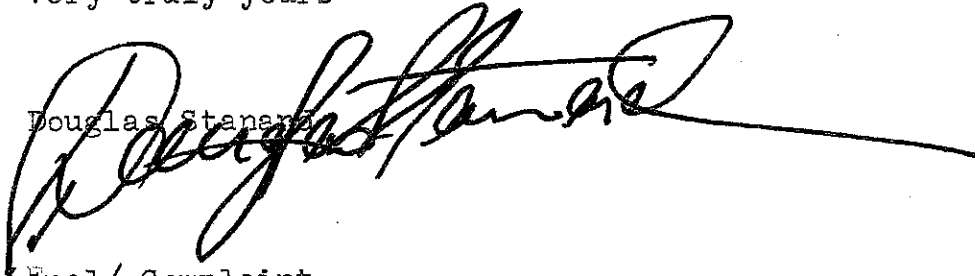
Hon. Clerk of the Circuit Court  
Baldwin County Court House  
Bay Minette, Alabama

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

A large, stylized handwritten signature in black ink, appearing to read 'Douglas Stanard', written over the typed name.

Encl/ Complaint  
DS/la

1957

July

Linda Harrell, suing  
by her father and  
next friend  
Frances E. Harrell

vs.

Juanita Griffin

Marriages  
Filed 4-1-57

Douglas Standard  
William Grayson