

DONNA WAGNER,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
	)	
VS.	)	AT LAW
	)	
WILLIAM D. COUNTRYMAN,	)	
	)	CASE NO. <u>9118</u>
Defendant.	)	

COMPLAINT

The Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS, as damages, for that heretofore and on, to-wit, February 14, 1969, the Plaintiff was riding as a passenger in a motor vehicle being then operated on or upon Hall Avenue, a public street, in Bay Minette, Baldwin County, Alabama, at a point where said Hall Avenue crosses Fifth Street, a public street, in Bay Minette, Alabama, and the Defendant so negligently operated his motor vehicle at the time and place aforesaid, as to cause or allow the same to collide with the motor vehicle in which the Plaintiff was riding as a passenger, and as a proximate result of the Defendant's negligence as aforesaid, the Plaintiff was caused to sustain and did sustain the following injuries and damages: she was made sick, sore and lame; her body was broken; she was caused to suffer severe physical pain and mental anguish; she sustained a fractured clavicle; she sustained multiple contusions; she was permanently scarred; and she was caused to incur hospital bills, doctors bills and other medical expenses in and about the care and treatment of her injuries.

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

By

Thomas G. Greaves III  
THOMAS G. GREAVES III

Defendant may be served at:

11 East 4th Street  
Bay Minette, Alabama

*Filed*  
*2-11-70*  
*Alice J. Duck, Clerk.*

SUMMONS AND COMPLAINT

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

Circuit Court, Baldwin County

No. 9118

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William D. Countryman

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

William D. Countryman ... Defendant

by Donna Wagner

Plaintiff

Witness my hand this 11th day of February 19 70

Alice J. Luck Clerk

No. 9118

Page.....

**THE STATE OF ALABAMA**

**BALDWIN COUNTY**

**CIRCUIT COURT**

DONNA WAGNER

Plaintiffs

vs.

WILLIAM D. COUNTRYMAN

Defendants

**SUMMONS AND COMPLAINT**

Filed Feb. 11, 1970.

Alice J. Duck Clerk

Hand, Arendall, Bedsole, Greaves & Johnston  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:  
P. O. DRAWER C  
OR P. O. BOX 123

CABLE ADDRESS:  
HAB  
TELEPHONE  
432-5511  
AREA CODE 205

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
ALEX F. LANKFORD, III  
EDMUND R. CANNON  
LYMAN F. HOLLAND, JR.  
J. THOMAS HINES, JR.  
DONALD F. PIERCE  
LOUIS E. BRASWELL  
HAROLD D. PARKMAN  
G. PORTER BROCK, JR.  
HARWELL E. COALE, JR.  
STEPHEN G. CRAWFORD  
JERRY A. McDOWELL  
W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
A. CLAY RANKIN, III  
EDWARD A. HYNDMAN, JR.  
MICHAEL D. KNIGHT  
G. HAMP UZZELLE, III  
THOMAS GUY GREAVES, III

February 9, 1970

Clerk's Office  
Circuit Court  
Baldwin County Courthouse  
Bay Minette, Alabama

9/11/8

Re: Donna Wagner v. William D. Countryman  
Annie McClean Hubis v.  
William D. Countryman

Dear Madam:

I enclose herewith two (2) complaints. Please file these as a matter of record and acknowledge receipt and filing by signing the enclosed tissue copy of this letter.

I have talked with Mr. Norborn Stone with regard to settling both claims represented by these complaints and, as settlement is a possibility, please postpone serving the defendant until I notify you. Mr. Stone has agreed to appear for the defendant, thereby obviating the necessity to perfect service, in the event that we are not able to settle the above claims.

Very truly yours,

*Thomas G. Greaves, III*

Thomas G. Greaves, III

TGGIII:cm

Enc.

cc: Norborn Stone, Esq.  
Chason, Stone & Chason

SUMMONS AND COMPLAINT

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

Circuit Court, Baldwin County

No. **9118**

.....TERM, 19.....

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**William D. Countryman**

... Defendant.....

by **Donna Wagner**

....., Plaintiff.....

Witness my hand this **11th** day of **February** 19 **70**

*Alice J. Luck* Clerk

No.....

Page.....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

Plaintiffs

vs.

Defendants

**SUMMONS AND COMPLAINT**

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Defendant's Attorney

Defendant lives at

Received In Office

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Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

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