

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 MINES, JR.
DONALD F. PIERCE
LOUIS E. DRASWELL
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. HYNOMAN, 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

9119

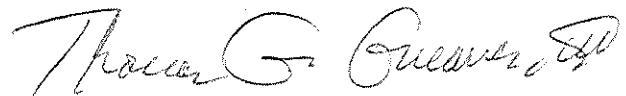
Re: Donna Wagner v. William D. Countryman
Annie McClean Hubis v.
William D. Countryman

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

TGGIII:cm

Enc.

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

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. **9119**

.....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 **Annie McClean Hubis**

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

Witness my hand this.....**14th**.....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

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Recieved In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

ANNIE McCLEAN HUBIS,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
VS.)	AT LAW
)	
WILLIAM D. COUNTRYMAN,)	CASE NO. <u>9119</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 operating a motor vehicle 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 being then and there operated by the Plaintiff, 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 bruised; she was caused to suffer severe physical pain and mental anguish, and still so suffers; she sustained a severe laceration of her forehead and other contusions and abrasions; 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

ANNIE McCLEAN HUBIS,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
VS.)	AT LAW
)	
WILLIAM D. COUNTRYMAN,)	CASE NO. <u>9119</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 operating a motor vehicle 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 being then and there operated by the Plaintiff, 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 bruised; she was caused to suffer severe physical pain and mental anguish, and still so suffers; she sustained a severe laceration of her forehead and other contusions and abrasions; 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

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9119

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 Annie McClean Hubis

Plaintiff.....

Witness my hand this 11th day of February 1970..

Alice J. Huber Clerk

No. 9119.....

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

ANNIE McCLEAN HUBIS

Plaintiffs

vs.

WILLIAM D. COUNTRYMAN

Defendants

SUMMONS AND COMPLAINT

Filed ...February 11,..... 19 70..

Alice J. Duck Clerk

Hand, Arendall, Bedsole, Greaves & Johnston

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Recieved In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff