

STATE OF ALABAMA X
BALDWIN COUNTY X

C I R C U I T C O U R T.
TO ANY SHERIFF OF THE STATE OF ALABAMA
GREETINGS:

You are hereby commanded to summon Standard Furniture Manufacturing Company, Inc., Bayminnette, Alabama, to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur within thirty (30) days from service hereof to the complaint of Joseph S. Ritner.

Witness my hand this 15 day of Jan, 1921.

Alice J. Weeks
CLERK.

* * * * *

C O M P L A I N T

JOSEPH S. RITNER,	X	IN THE CIRCUIT COURT OF
PLAINTIFF,	X	BALDWIN COUNTY, ALABAMA.
VS.	X	LAW SIDE.
STANDARD FURNITURE MANUFACTURING COMPANY, INC.	X	NO: <u>9640</u> .
DEFENDANT.	X	

COMES YOUR PETITIONER, Joseph S. Ritner, and files his complaint under the Workmen's Compensation Statutes of the State of Alabama, against Standard Furniture Manufacturing Company, Inc., and claims compensation and medical payments due and owing under the following statement of facts, and respectfully shows unto the Court as follows:

(1) Your Petitioner, Joseph S. Ritner, shows unto the Court that he is 25 years of age, a resident of Atmore, Escambia County, State of Alabama, and that the Defendant, Standard Furniture Manufacturing Company, Inc., is in the furniture

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manufacture and sales business and was so doing business in the State of Alabama, Baldwin County, Alabama, on or about, to-wit, the 17th day of January, 1970.

(2) That on, to-wit, the 17th day of January, 1970, Petitioner was employed by said Defendant in Baldwin County, Alabama, and that while so employed by said Defendant, your Petitioner suffered an accident which arose out of and in the line and scope of his employment, and Petitioner shows that while he was so acting in the line and scope of his employment, driving a truck about ten (10) to fifteen (15) miles North of Tallahassee, Florida on highway #90; your Petitioner fell out of and off of said truck and was severely injured in that your Petitioner injured his legs, arms and body and severely injured his collar bone and right shoulder and broke his right collar bone; that as a proximate result of said accident your Petitioner was severely and painfully injured and was caused to suffer permanent disability and has been left permanently and partially disabled; that said injuries took place about ten (10) to fifteen (15) miles North of Tallahassee, Florida on highway #90; and that said injuries arose out of and in the scope of his said employment.

(3) That your Petitioner was painfully and severely injured in said accident, causing Petitioner to spend much time in the hospital and resulting in extended medical treatment which is still continuing at this time.

(4) That at the time of said accident your Petitioner and his said Employer, Standard Furniture Manufacturing Company, Inc., were both subject to the provisions to the Alabama Workmen's Compensation Law.

(5) That at the time of said accident the Defendant had actual knowledge of the accident and has been notified of your Petitioner's claim for compensation and medical payments under the laws of Alabama.

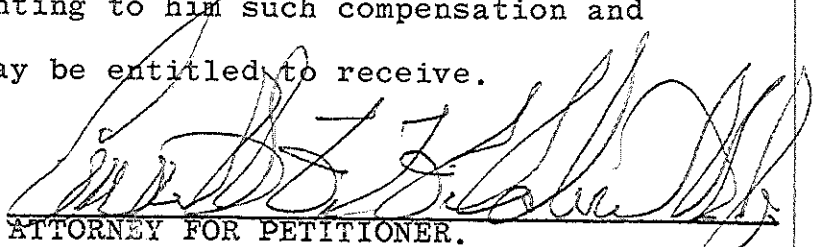
(6) Your Petitioner further avers that he is married and that his average wages at the time of his injury was at the rate of \$160.00 per week, and that he has two (2) minor children dependent upon him.

(7) Your Petitioner specially pleads and claims medical payments due in the amount of \$3,000.00.

(8) That no payments of compensation have been made, and no medical payments.

(9) A controversy has now arisen between your Petitioner and the Defendant as to the extent of his disability and the number of weeks of Compensation which should be paid thereof; and as to the amount of medical payments.

The premises considered, your Petitioner shows unto the Court that he is entitled to receive from the Defendant the Compensation and medical payments provided by the Statutes of the State of Alabama covering such cases and he prays that said Standard Furniture Manufacturing Company, Inc., Bayminnette, Alabama, be made party Defendant to this his complaint; that the Court will make an order fixing the time and place for the hearing of this complaint and that the Defendant be required to sign a verified answer thereto setting up the facts, if any, upon which they rely in defense hereof; and the Petitioner prays that on the hearing of this petition and complaint a judgement or decree be entered granting to him such compensation and medical payments as he may be entitled to receive.


ATTORNEY FOR PETITIONER.

STATE OF ALABAMA X

ESCAMBIA COUNTY X

Before me, Charlie S. Powell, a Notary Public in and for said State and County, personally appeared Emmett F. Hildreth, Jr., Attorney for Petitioner, who, being known to me, stated under oath, that the facts and things alleged in the foregoing Petition are true and correct according to his best information, knowledge and belief.

70-357 Charlie S. Powell

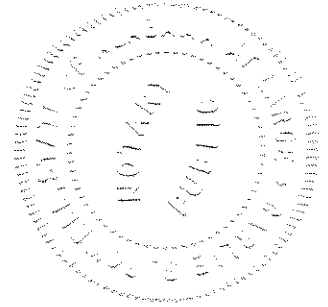
Sworn to and subscribed before me on this 15th
day of January, 19 71.

Charlie S. Powell
NOTARY PUBLIC.
My Commission Expires April 25, 1973

FILED

JAN 15 1971

ALICE J. DUCK CLERK
REGISTER



71-358

241-28-71

9640

Joseph S. Ritner

vs.

Standard Furniture
Mfg. Co.

RECEIVED

JAN 18 1971

TAYLOR WILKINS
SHERIFF

Received day of Jan 1971
and on 28 day of Jan 1971
I served a copy of the within Ad & C
on Standard Furniture
By service on James Thompson
TAYLOR WILKINS Sheriff
By W A Gilbert S.



Emmett Gildred

Shall claim 0 dollars
For Costs per mile Total \$—
TAYLOR WILKINS, Sheriff
BY Gilbert
DEPUTY SHERIFF

JOSEPH S. RITNER,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	LAW SIDE
STANDARD FURNITURE MANUFAC-)	
TURING COMPANY, INC.,)	CASE NO. 9640 <i>6</i>
Defendant.)	

ANSWER

Comes now the defendant, STANDARD MANUFACTURING COMPANY, INC., a corporation, in the above styled cause and for answer to the plaintiff's workmen's Compensation complaint as heretofore filed against it, and to each and every paragraph and aspect thereof, separately and severally, files the following answer, separately and severally, to-wit:

1. This defendant is not guilty of the matters and things complained of therein.
2. This defendant denies each and every one of the material allegations contained therein.
3. This defendant denies each and every material allegation contained in each paragraph of the bill of complaint herein and demands strict proof thereof.

INGE, TWITTY, DUFFY & PRINCE

By *Sydney R. Prince, III*
Sydney R. Prince, III

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 23 day of Jan, 1971.

Sydney R. Prince, III
Attorney for

FILED

JAN 28 1971

Ernie B. Blackman
Clerk

EMMETT F. HILDRETH, JR.

ATTORNEY AT LAW

504 E. NASHVILLE AVE.
ATMORE, ALABAMA 36502

PHONE 368-3199
P. O. BOX 757

September 5, 1972

Eunice B. Blackmon
Circuit Clerk of Baldwin County
P. O. Box 239
Bay Minette, Alabama 36507

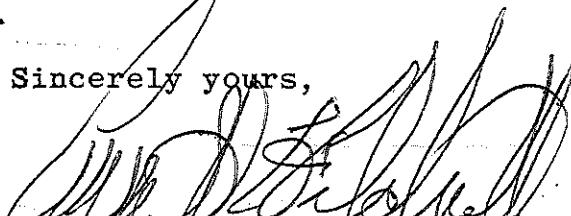
Re: Joseph S. Ritner
vs.
Standard Furniture Manufacturing Co.
Workman's Compensation - Case # 9640

Dear Eunice,

Honorable George H. McKean, Attorney for Defendant,
Standard Furniture, in the above styled case, and I, as
Attorney for the Plaintiff, request the court to continue the
case to the next term.

We are now securing final medical reports and doctor's
costs, for settlement of the case.

Sincerely yours,


EMMETT F. HILDRETH, JR.

EFH, JR/cgd

cc

June 7, 1972

Honorable Telfair Mashburn, Judge
Circuit Court of Baldwin County
Bay Minette, Alabama

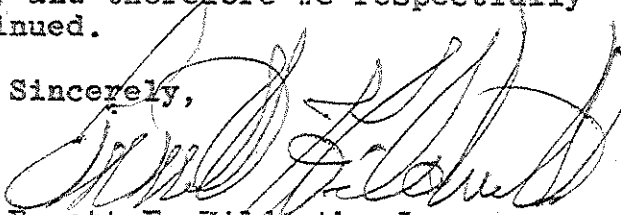
Re: Joseph S. Ritner vs.
Standard Furniture Mfg. Company
Case No. 9640

Dear Judge Mashburn:

I would appreciate your continuing the above styled case for this next term of court.

We feel that the case can and will be settled, pending receipt of all medical bills and statements. The Defendant's attorney and I concur in this, and therefore we respectfully request that the case be continued.

Sincerely,



Emmett F. Hildreth, Jr.

EFH, JR/cgd

cc: Eunice B. Blackmon
Circuit Clerk
Baldwin County

EMMETT F. HILDRETH, JR.
ATTORNEY AT LAW

504 E. NASHVILLE AVE,
ATMORE, ALABAMA 36502

PHONE 368-3199
P. O. BOX 757

December 7, 1971

Eunice B. Blackmon, Circuit Clerk
P. O. Box 239
Bay Minette, Ala. 36507

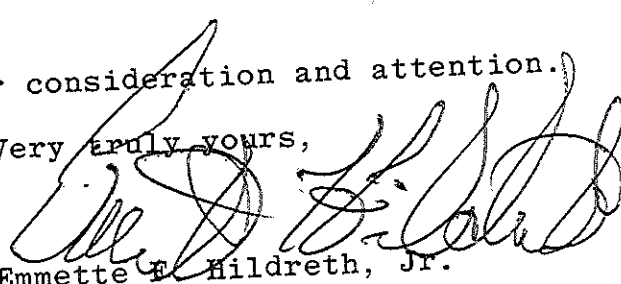
Re: Joseph S. Ritner vs.
Standard Furniture Manufacturing Company
Workmen's Compensation Number 9640

Madam:

In pursuant with the agreement with George H. McKean,
attorney for the defendant, we would like the above styled
case continued, in order to secure doctor's statements
and complete deposition.

Thanking you for your consideration and attention.

Very truly yours,


Emmette F. Hildreth, Jr.

EFH/cgd

cc

EMMETT F. HILDRETH, JR.

ATTORNEY AT LAW

504 E. NASHVILLE AVE.
ATMORE, ALABAMA 36502

PHONE 368-3199
P. O. BOX 757

March 7, 1972

Eunice B. Blackmon
P. O. Box 239
Bay Minette, Alabama 36507

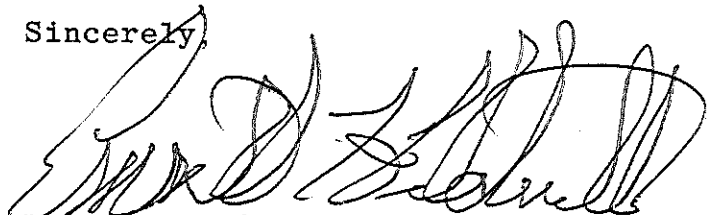
Re: Joseph S. Ritner VS. Standard Furniture Manufacturing Company

Dear Eunice,

We are in the process of taking depositions and medical statements on the above styled case. The attorney for the Defendant and I have agreed to continue this case, for the completion of the depositions, hearings, and etc.

Please have this case continued by mutual consent of both parties for the said purpose.

Sincerely,



Emmett F. Hildreth, Jr.

EFH, JR/cgd

cc

Joseph B. Brogden

ATTORNEY AT LAW

P. O. BOX 755

ATMORE, ALABAMA

36502

368-5360

February 11, 1975

368-5330

9640

Mr. George H. McKean
Inge, Twitty, Duffy & Prince
Attorneys At Law
P. O. Box 1109
Mobile, Alabama 36602

Re: Joseph Stanley Ritner -vs- Standard
Furniture Manufacturing Company

Dear George:

Please find enclosed herewith your company's draft (No. D5-215571) in the amount of \$500.

I am sending a copy of this letter along with a copy of your January 15, 1975, letter to the Baldwin County Circuit Clerk with a request that these copies be placed in this file.

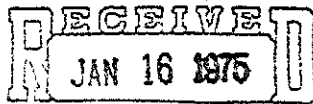
Yours very truly,

Joseph B. Brogden

kak

cc. Baldwin County Circuit Clerk

FOR YOUR INFORMATION



INGE, TWITTY, DUFFY & PRINCE
LAWYERS

THOS. E. TWITTY
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III
JOHN N. LEACH, JR.
GEORGE H. MCKEAN
E. L. McCAFFERTY, III
CHRISTOPHER G. HUME, III

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36602

MAILING ADDRESS:

P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:

TWINING
TELEPHONE
433-5441

FRANCIS H. INGE (1902-1959)

RICHARD H. INGE
COUNSEL

January 15, 1975

Joseph B. Brogden, Esquire
Post Office Box 755
Atmore, Alabama 36502

Re: Joseph Stanley Ritner v.
Standard Furniture Manufacturing Company

Dear Joe:

This will confirm our telephone conversation of January 15, 1975, wherein it was agreed that you would return to me my client's settlement draft No. D5-215571 in the amount of \$500 for cancellation. It is understood that should Mr. Ritner ever appear and make claim for the settlement amount of \$500, that Liberty Mutual will reissue their draft in that amount upon receipt of the executed settlement documents and their approval by the court. It is further understood that the payment of the \$500 will be in full settlement of the matter and that there will be no interest due on the money since it has been the delay of the claimant in executing the settlement documents that has caused the delay in the final settlement of the matter and the court approval. I have this day discussed with Mr. Douglas R. Nelson of Liberty Mutual this agreement and he has authorized it on behalf of Liberty Mutual.

Therefore, please return to me at your earliest convenience the above referenced settlement draft. I appreciate your assistance in resolving this matter.

Cordially,

GEORGE H. MCKEAN

GHMcK/brm

cc: Mr. Douglas R. Nelson

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

FRANCIS H. INGE (1902-1959)
THOS. E. TWITTY
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III
JOHN N. LEACH, JR.

MERCHANTS NATIONAL BANK BUILDING
MOBILE, ALABAMA
36602

MAILING ADDRESS:
P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:
TWINING
TELEPHONE
433-5441

June 1, 1971

Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Joseph S. Ritner vs.
Standard Furniture Mfg. Co.
Case No. 9640

Dear Mrs. Blackmon:

I have received notice that the above referenced compensation suit is set on Judge Mashburn's non-jury docket for Thursday, June 17. I have discussed this matter with Mr. Hildreth and he says that the case cannot be ready for trial on that date due to the fact that his client is somewhere in Florida and we have not yet completed discovery on the case.

There is a very good chance that this case will be dismissed prior to trial but we are awaiting further medical information before making any such decision.

Your cooperation is greatly appreciated.

Cordially yours,



Sydney R. Prince, III
For the Firm

SRP, III:tt
cc: Mr. Emmett Hildreth