

HUGH T. COSTELLO, SR. : IN THE CIRCUIT COURT OF
PLAINTIFF : BALDWIN COUNTY, ALABAMA
VS : AT LAW
ELLEN HARRISON DAWSON :
DEFENDANT : CASE NO: 9709

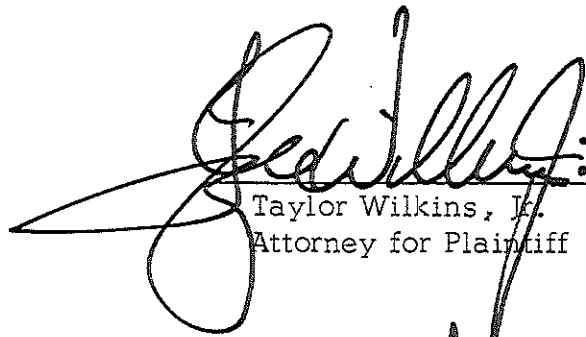
COUNT I

Plaintiff claims of the Defendant, the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore and on, to-wit, January 10, 1971, the Defendant, Ellen Harrison Dawson, so negligently operated an automobile on Alabama State Highway #59, a public road in the County of Baldwin, State of Alabama, at a point approximately, to-wit, 4.5 miles North of Loxley, Alabama, that the said automobile then and there collided with the Plaintiff's automobile in which automobile the Plaintiff was riding as a passenger, on said Alabama Highway #59, and as a proximate result of the negligence of the Defendant as aforesaid, Plaintiff was made sick, sore and lame, his ribs were bruised, he suffered a fractured nose, his head, knee and hands were lacerated, and he was caused to be hospitalized and incurred medical expenses for the treatment of his injuries and lost time from his employment, his car was bent, broken, smashed and rendered less valuable, for all of which the Plaintiff brings this suit.

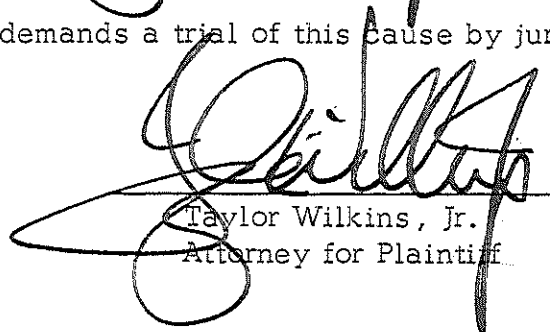
COUNT II

Plaintiff claims of the Defendant, the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore and on, to-wit, January 10, 1971, the Defendant, Ellen Harrison Dawson, so wantonly operated an automobile on Alabama State Highway #59, a public road in the County of Baldwin, State of Alabama, at a point approximately, to-wit, 4.5 miles North of Loxley, Alabama, that the said automobile then and there collided with the Plaintiff's automobile in which automobile the Plaintiff was riding as a passenger, on said Alabama Highway #59, and as a proximate result of the wantonness

of the Defendant as aforesaid, Plaintiff was made sick, sore and lame, his ribs were bruised, he suffered a fractured nose, his head, knee and hands were lacerated, and he was caused to be hospitalized and incurred medical expenses for the treatment of his injuries and lost time from his employment, his car was bent, broken, smashed and rendered less valuable, for all of which the Plaintiff brings this suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

Plaintiff respectfully demands a trial of this cause by jury.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED
FEB 24 1971
EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9709

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ELLEN HARRISON DAWSON

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

ELLEN HARRISON DAWSON, Defendant

by HUGH T. COSTELLO, SR.

Plaintiff

Witness my hand this 24 day of Feb 1921

Ernie B. Blackman, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HUGH T. COSTELLO, SR.

Plaintiffs

vs.

ELLEN HARRISON DAWSON

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 1971

FEB 26 1971

Clerk

EUNICE B. BLACKMON
CIRCUIT CLERK

Taylor Wilkins, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1

Monroeville, Alabama

Received In Office

Feb. 24 1971

(Taylor Wilkins) Sheriff

I have executed this summons

this Feb. 25 1971

by leaving a copy with

Ellen Harrison Dawson

E. C. Watson, Sheriff of Monroe County,

Ala., claims \$1.50 ea. for services 1

Process(es) And 10¢ per mile for 20
miles,

Total \$ 3.50

L. Skner Deputy Sheriff

E. C. Watson

Sheriff

Larry Skner

Deputy Sheriff

HUGH T. COSTELLO, SR.

PLAINTIFF

VS

ELLEN HARRISON DAWSON

DEFENDANT

X

X

X

X

X

IN THE CIRCUIT COURT OF

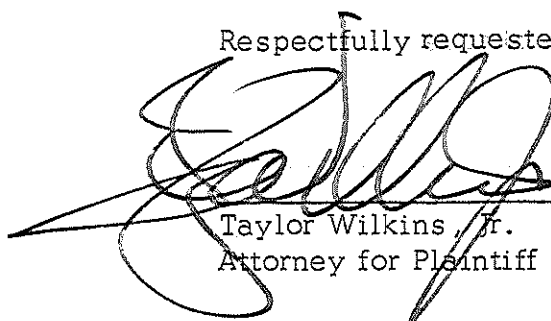
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 9709

Comes now the Plaintiff, Hugh T. Costello, Sr., and withdraws his demand for jury in accordance with Title 7, Section 260 of the Code of Alabama, 1940, as amended, and request this Honorable Court to transfer this cause to the Civil Non-jury docket, there being no appearance filed by the Defendant, Ellen Harrison Dawson.

Respectfully requested:




Taylor Wilkins, Jr.
Attorney for Plaintiff

ORDER OF COURT

The Court having considered the petition of the Plaintiff in the above styled cause requesting that the above case be transferred to the civil non-jury docket, there being no appearance filed by the Defendant, it is, therefore,

ORDERED, ADJUDGED AND DECREED by the Court that this cause be and the same is hereby transferred to the Court's Civil Non-jury docket.

DONE this the 18th day of January, 1972.



Honorable Telfair J. Mashburn
Judge of the Circuit Court
Baldwin County, Alabama