

MARIE COSTELLO : IN THE CIRCUIT COURT OF
PLAINTIFF : BALDWIN COUNTY, ALABAMA
VS : AT LAW
ELLEN HARRISON DAWSON :
DEFENDANT : CASE NO: 9711

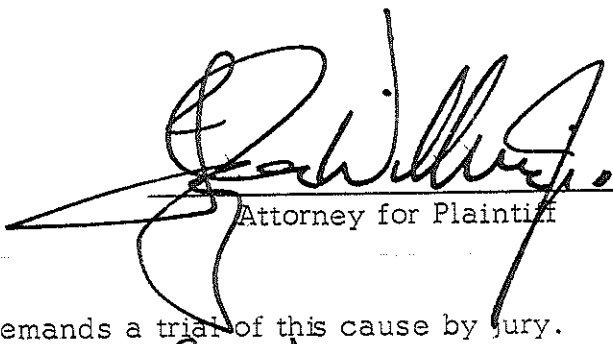
COUNT I

Plaintiff claims of the Defendant, the sum of, FIVE THOUSAND (\$5,000.00) DOLLARS as damages for that heretofore and on, to-wit, January 10, 1971, the Defendant, Ellen Harrison Dawson, negligently damaged the Plaintiff by negligently driving an automobile into and against an automobile in which the Plaintiff was riding as a passenger, Plaintiff avers that at the time and place complained the vehicle operated by the Defendant, Ellen Harrison Dawson, was being operated on Alabama State Highway #59, a public road in the County of Baldwin, State of Alabama, at a point approximately 4.5 miles North of Loxley, Alabama, and the vehicle in which Plaintiff was riding as a passenger was being operated on said Alabama Highway #59, Plaintiff avers that as a proximate result of the negligent conduct of the Defendant, Plaintiff was made sick, sore and lame, her ribs were bruised, she suffered severe lacerations to her lips, head, face and nose, she suffered a compression of the anterior chest, and she was caused to be hospitalized and incurred medical expenses for the treatment of her injuries, for all of which the Plaintiff brings this suit.

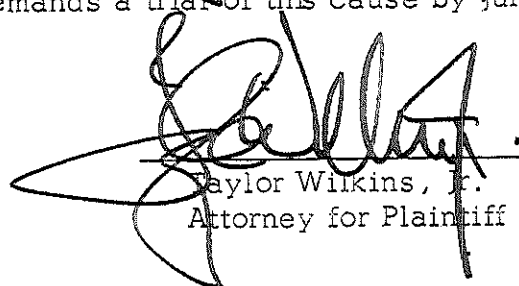
COUNT II

Plaintiff claims of the Defendant, the sum of, FIVE THOUSAND (\$5,000.00) DOLLARS as damages for that heretofore and on, to-wit, January 10, 1971, the Defendant, Ellen Harrison Dawson, wantonly damaged the Plaintiff by wantonly driving an automobile into and against an automobile in which the Plaintiff was riding as a passenger, Plaintiff avers that at the

time and place complained the vehicle operated by the Defendant, Ellen Harrison Dawson, was being operated on Alabama State Highway #59, a public road in the County of Baldwin, State of Alabama, at a point approximately 4.5 miles North of Loxley, Alabama, and the vehicle in which Plaintiff was riding as a passenger was being operated on said Alabama Highway #59, Plaintiff avers that as a proximate result of the wanton conduct of the Defendant, Plaintiff was made sick, sore and lame, her ribs were bruised, she suffered severe lacerations to her lips, head, face and nose, she suffered a compression of the anterior chest, and she was caused to be hospitalized and incurred medical expenses for the treatment of her injuries, for all of which the Plaintiff brings this suit.


Attorney for Plaintiff

Plaintiff respectfully demands a trial of this cause by jury.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

FEB 23 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

}

Circuit Court, Baldwin County

No.

.....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 MARIE COSTELLO

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

Witness my hand this 24 day of Feb 19.21

Ernie B. Blackburn, Clerk

No. 9211

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MARIE COSTELLO

Plaintiffs

vs.

ELLEN HARRISON DAWSON

Defendants

SUMMONS AND COMPLAINT

Filed 1911 FEB 24 19.....

1911 FEB 24 1911 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 1911

Taylor Wilkins Sheriff

I have executed this summons

this Feb. 25 1911

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 \$ 31.50

A. Ikner Deputy Sheriff

E. C. Watson Sheriff

Larry Ikner Deputy Sheriff

MARIE COSTELLO

PLAINTIFF

VS

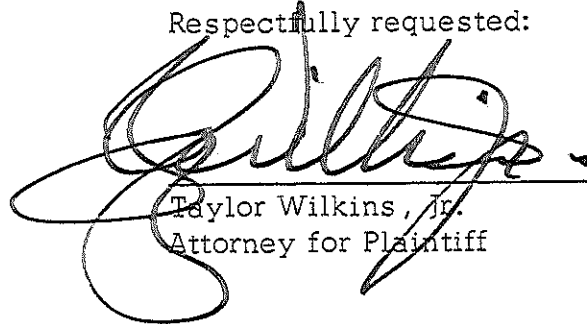
ELLEN HARRISON DAWSON

DEFENDANT

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW
X
X CASE NO: 9712

Comes now the Plaintiff, Marie Costello, and withdraws her 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:



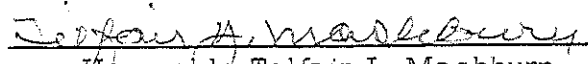
Taylor Wilkins, Jr.
Attorney for Plaintiff

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 the above case 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