HELGA DRANE,

Plaintiff

۷s.

ROY H. GILES, XYZ, a person, § firm, partnership or corpora- § tion that was the owner or § operator of the automobile § involved in the accident with § the Plaintiff on September 6, § 1970, whose name or names are § otherwise unknown to the Plaintiff at this time, but § will be added by amendment § when ascertained, jointly and § severally,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 10,012

COUNT ONE

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Plaintiff claims of the Defendants the sum of TEN THOUSAND DOLLARS (\$10,000.00) for that heretofore and on, to-wit: September 6, 1970, the Defendants did so negligently operate a motor vehicle on State Road #104 at or near Silverhill, said road being a public road in the County of Baldwin, Alabama, so as to cause or allow said motor vehicle to collide with a motor vehicle in which the Plaintiff was riding as a passenger and which was being operated on said State Road #104 at said time and place, and as a direct and proximate result of the aforesaid negligence of the Defendants, the Plaintiff suffered the following injuries and damages: she was made sick, sore and lame; she was bruised and contused; she suffered lacerations to her body, her arms and legs; she suffered a severe injury to her back; she was permanently injured; and she was caused to suffer severe physical and mental pain and anguish, still so suffers and will so suffer in the future; thence this suit.

Plaintiff demands trial y jury.

Defendant's Address: Route 1, Box 270 Daphne, Alabama

AUS 00 1971

EUNICE B. BLACKWON CIRCUIT

STATE OF ALABAMA)	Circuit Cour	t, Baldwin County
Baldwin County	No.	er er	
	•	*****	TERM, 19
	TO ANY SHER	UFF OF THE STA	ATE OF ALABAMA:
You Are Hereby Commanded to Sum	mon Roy H	. Giles,	······································

to appear and plead, answer or de	mur, within thirty	days from the ser	vice hereof, to the complain
filed in the Circuit Court of Baldwin C	ounty State of A	lahama at Bay Min	etta against
	-	-	-
Roy H. Giles, XYZ a person,	firm, partner	ship or corp. e	tc. Defendant
by HELGA DRANE	•••••		
			Plaintiff
Witness my hand this	day ofAu		19. <u>71</u>
	6	uniel i	J Stackman Cler

Ef 9-8-71

A VOL 70 PAGE 218

Plaintiff's Attorney Defendant's Attorney

Defendant lives at

Maghne
Received In Office
Muq. 30 1971
Sheriff
I have executed this summons
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Key H. Miles
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Sheriff claling 46 miles at
Sheriff claims 47 miles at
JAYLOR WILKINS, Sheriff
PA UTY CHOISE
Comment of the second s
Tay by Wilkins , Sheriff
Fred Seilat Deputy Sheriff

BAILEY & TAYLOR ATTORNEYS AT LAW 61 NORTH SECTION STREET P. O. BOX 361 FAIRHOPE, ALABAMA 36532 OCTOBER 4, 1971

Mrs. Eunice Blackmon Clerk, Circuit Court Bay Minette, Alabama, 36507

RE: WILLIAM DRANE, HELGA DRANE
vs. Roy H. GILES, ET AL vs. Roy H. GILES,
AT LAW # 10,012

HELGA DRANE
vs. Roy H. GILES,
AT LAW # 10,012

DEAR EUNICE

PLEASE FILE THE ENCLOSED DEMURRERS IN THE ABOVE CASES.

THANKING YOU FOR YOUR ASSISTANCE IN THIS MATTER, I AM

VERY TRULY YOURS,

LLOYE E. TAYLOR

LET/w

 I_{NCLS} : 2