

CHARLES S. BARALL,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VALNA M. LOWELL,) AT LAW
Defendant.) CASE NO. 10,020

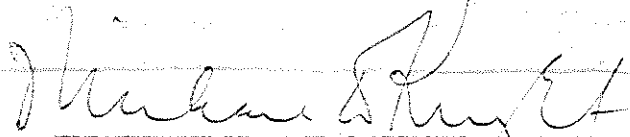
COUNT ONE

Plaintiff claims of the defendant the sum of TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, for that heretofore and on, to-wit, February 4, 1971, the plaintiff was operating his automobile in a westerly direction on and along U. S. Highway 90 at a point approximately one mile south of Spanish Fort at which said point said U. S. Highway 90 is a public road in Baldwin County, Alabama, and at said time and place the defendant so negligently operated his automobile as to cause or allow the same to collide with the plaintiff's automobile. Plaintiff further avers that as a proximate result of the negligence of the defendant as aforesaid, plaintiff was injured in this: He suffered multiple bruises, contusions and abrasions to his leg and thigh; he sustained injuries to his cervical and dorsal spine; he was caused to suffer and will continue to suffer physical pain and mental anguish; he was caused to incur and will continue to incur expenses in and about his care and treatment; he was caused to lose time from his employment; his automobile was broken; smashed, bent and damaged and rendered less valuable; and he lost the use thereof for a considerable period of time; hence, this suit.

COUNT TWO

Plaintiff claims of the defendant the sum of TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, for that heretofore and on, to-wit, February 4, 1971, the plaintiff was operating his automobile in a westerly direction on and along U. S. High-

way 90 at a point approximately one mile south of Spanish Fort at which said point said U. S. Highway 90 is a public road in Baldwin County, Alabama, and at said time and place the defendant so wantonly operated his automobile as to cause or allow the same to collide with the plaintiff's automobile. Plaintiff further avers that as a proximate result of the wantonness of the defendant as aforesaid, the plaintiff was wantonly injured in this: He suffered multiple bruises, contusions and abrasions to his leg and thigh; he sustained injuries to his cervical and dorsal spine; he was caused to suffer and will continue to suffer physical pain and mental anguish; he was caused to incur and will continue to incur expenses in and about his care and treatment; he was caused to lose time from his employment; his automobile was broken; smashed, bent and damaged and rendered less valuable; and he lost the use thereof for a considerable period of time; hence, this suit.

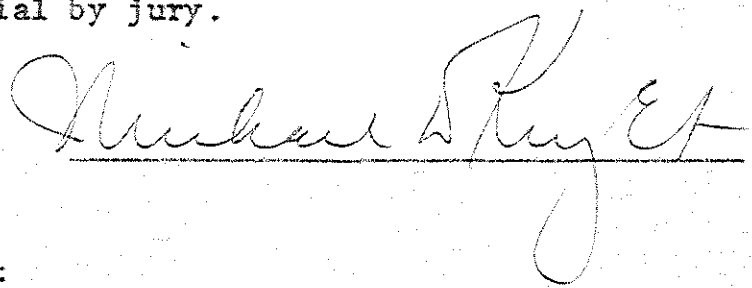


MICHAEL D. KNIGHT
Attorney for the Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Plaintiff demand a trial by jury.



Defendant may be served at:

Route 1, Box 146-A
Loxley, Alabama

FILED

SEP 8 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
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LOUIS E. BRASWELL
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STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

April 2, 1973

Mrs. Eunice Blackman
Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama, 36507

Barall
RE: Charles Varall vs. Valna Lowell 10,020

Dear Mrs. Blackman:

Mrs. Dusenberry recently called me while she was setting Judge Mashburn's next jury docket. She mentioned this case would probably be set and wondered if we could be ready to try it. My records reflect that the case was settled in July of 1972, and that I requested that a nonsuit be entered on behalf of the plaintiff with costs taxed to the defendant. Please check your files for me and see if there is anything else that needs to be done to effectively take this case off the docket.

Best regards.

Yours very truly,



For the Firm

MDKslm

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

August 31, 1971

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
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Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

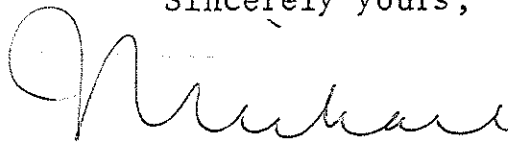
RE: Charles Barall v. Valna Lowell

Dear Mrs. Blackmon:

I have enclosed herein the original and one copy of a complaint, and request that you file the same on behalf of Charles Barall as plaintiff. Would you please acknowledge the receipt of this complaint and the filing thereof by signing and returning the enclosed tissue copy of this letter.

Best regards.

Sincerely yours,



For the Firm

MDK.er
Enclosures

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 10,020

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Velna M. Lowell

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.....

Velna M. Lowell
....., Defendant.....

by Charles S. Barall

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

Witness my hand this 8th day of Sept. 1971

Eunice B. Blackburn Clerk

CHARLES S. BARALL,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VALNA M. LOWELL,)	AT LAW
Defendant.)	CASE NO. <u>10,020</u>

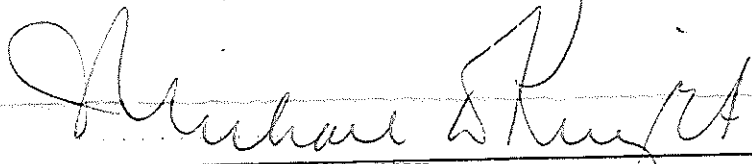
COUNT ONE

Plaintiff claims of the defendant the sum of TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, for that heretofore and on, to-wit, February 4, 1971, the plaintiff was operating his automobile in a westerly direction on and along U. S. Highway 90 at a point approximately one mile south of Spanish Fort at which said point said U. S. Highway 90 is a public road in Baldwin County, Alabama, and at said time and place the defendant so negligently operated his automobile as to cause or allow the same to collide with the plaintiff's automobile. Plaintiff further avers that as a proximate result of the negligence of the defendant as aforesaid, plaintiff was injured in this: He suffered multiple bruises, contusions and abrasions to his leg and thigh; he sustained injuries to his cervical and dorsal spine; he was caused to suffer and will continue to suffer physical pain and mental anguish; he was caused to incur and will continue to incur expenses in and about his care and treatment; he was caused to lose time from his employment; his automobile was broken; smashed, bent and damaged and rendered less valuable; and he lost the use thereof for a considerable period of time; hence, this suit.

COUNT TWO

Plaintiff claims of the defendant the sum of TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS, for that heretofore and on, to-wit, February 4, 1971, the plaintiff was operating his automobile in a westerly direction on and along U. S. High-

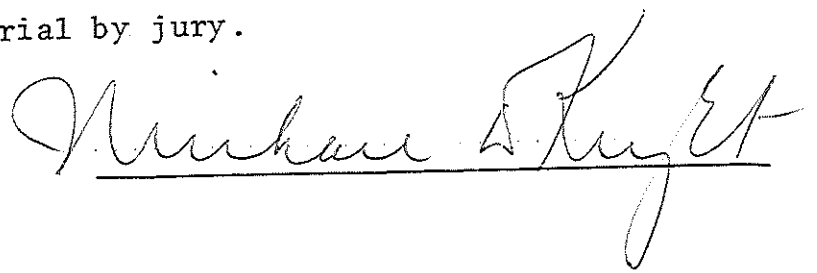
way 90 at a point approximately one mile south of Spanish Fort at which said point said U. S. Highway 90 is a public road in Baldwin County, Alabama, and at said time and place the defendant so wantonly operated his automobile as to cause or allow the same to collide with the plaintiff's automobile. Plaintiff further avers that as a proximate result of the wantonness of the defendant as aforesaid, the plaintiff was wantonly injured in this: He suffered multiple bruises, contusions and abrasions to his leg and thigh; he sustained injuries to his cervical and dorsal spine; he was caused to suffer and will continue to suffer physical pain and mental anguish; he was caused to incur and will continue to incur expenses in and about his care and treatment; he was caused to lose time from his employment; his automobile was broken; smashed, bent and damaged and rendered less valuable; and he lost the use thereof for a considerable period of time; hence, this suit.


MICHAEL D. KNIGHT
Attorney for the Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Plaintiff demand a trial by jury.



Defendant may be served at:

Route 1, Box 146-A
Loxley, Alabama

FILED

SEP 8 1971

EUNICE B. BLACKMON CIRCUIT CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 10,020

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Valna Mm. Lowell

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

Valana M. Lowell, Defendant

by Charles S. Barall

Plaintiff

Witness my hand this 8th day of September 1971

Emmie B. Blackburn, Clerk

N.F.

No. 10,020

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

CHARLES S. BARALL

Plaintiffs

vs.

VALNA M. LOWELL

Defendants

SUMMONS AND COMPLAINT

Filed Sept. 8, 1971

EUNICE B. BLACKMON Clerk

SEP 8 1971

JAYLOR WILKINS
SHERIFF

Michael D. Knight

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Sept. 8 1971

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Valna M. Lowell

Returned 8 day of Sept 1971

Not found in my county after diligent search and
inquiry: due to above being
deceased; Taylor Wilkins, Sh

By J. M. Bayre Deputy Sheriff

Sheriff

Deputy Sheriff

6000 6997
7342

10, 019

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

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A. CLAY RANKIN, III
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MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
BENJAMIN T. ROWE

April 17, 1973

19, 020

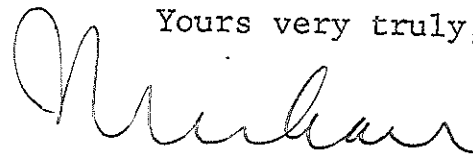
Mr. Thomas Dean
Claims Manager
Aetna Insurance Company
15 South 20th Street
Birmingham, Alabama, 35233

RE: Insured: V. M. Lowell
Policy No: FO-33-30-08M
Claim No: 13-AL-56-40-29
Our File: MDK 11,434

Dear Mr. Dean:

I was recently advised by the Circuit Court of Baldwin County that court costs in this case which has been settled now for almost a year have not been paid in accordance with our agreement of settlement in February of 1972. I have enclosed herein a cost bill from the Circuit Court of Baldwin County showing the costs in the amount of \$24.50. Please have Aetna issue its draft payable to Eunice Blackmon, Clerk, in satisfaction of these costs.

Yours very truly,



For the Firm

MDKslm
enclosure
cc: Mrs. Eunice Blackmon, Clerk

att 2-C

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