SHARON W. NELSON,

Plaintiff

BALDWIN COUNTY, ALABAMA

Vs.

AT LAW

HOMERA A. SCHNITZER,

Defendant

CASE NO. 9841

y - - 25°

COUNT ONE

Plaintiff claims of the Defendant the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, damages for that heretofore and on, to-wit: May 23, 1970, the Defendant so negligently operated an automobile on Church Street at its intersection with White Avenue, both of said streets being public streets in the City of Fairhope, Baldwin County, Alabama, as to cause the same to run into the side of the motor vehicle then and there driven and operated by the Plaintiff on White Avenue, and as a direct and proximate result of the negligence of the Defendant as aforesaid, the Plaintiff sustained the following damage and injuries: the automobile of the Plaintiff was smashed, bent, and damaged and the Plaintiff was injured and was made sick, sore and lame; her back was strained and sprained and otherwise injured and damaged; she sustained an injury to her spine resulting in the ligaments, muscles and other internal parts of her back being sprained, strained, pulled, torn and otherwise injured and damaged; she was caused to suffer physical pain and mental anguish; she was permanently injured; she was caused to incur considerable medical expenses in and about her efforts to cure her said wounds and injuries; and will incur further such expenses in the future; and she was caused to lose time from her employment.

> ENGEL, SMITH & TOLER Attorneys for Plaintiff

By: Jee & Junit Jr.

Leo A. Smith, Jr.

ENGEL, SMITH
& TOLER
ATTORNEYS AT LAW
SUITE 910
VAN ANTWERP BUILDING
P.O. BOX 1045
MOBILE. ALABAMA 36601
TELEPHONE
A/C 205 438-3625

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The Plaintiff respectfully demands a trial by jury.

Leo A. Smith, Jr.

Defendant's Address:

115 Fairhope Avenue Fairhope, Alabama

FILED

MAY 19 1971

EUNICE B. BLACKMON CLERK

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THE STATE OF ALARAMA

Circuit Court, Baldwin County

Circuit Court, Baldwin County
BALDWIN COUNTY 8841
110
TERM, 19
TO ANY SHERIFF OF THE STATE OF ALABAMA:
You Are Hereby Commanded to Summon Homera A. Schnitzer
·
P-11
to appear and plant
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
State of Alabama, at Bay Minette against
Homera A. Schnitzer
by Sharon W. Nelson Defendant Defendant
TO LOCATION AND AND AND AND AND AND AND AND AND AN
W:- Plaintiff
Witness ! Plaintiff
Witness my hand this. 19th day of May
19.71
Junie B Blackness C.

No	:	
THE STATE OF ALABAMA BALDWIN COUNTY	Defendant lives at	
CIRCUIT COURT	Received In Office	
SHARON W. NELSON	19	
Plaintiffs	I have executed this summons	
vs.	this	
	by leaving a copy with	
HOMERA A. SCHNITZER Defendants		
SUMMONS AND COMPLAINT		
Filed5/19/71		
EUNICE B. BLACKMON Clerk	. , , , , , , , , , , , , , , , , , , ,	
MAY 1 9 1971		
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Engel, Smith & Toler		
Plaintiff's Attorney	, Sherif	
Defendant's Attorney	Deputy Sherif	
	Moore Printing Co Bay Minette, Ala.	