

BETTY JANE TANNER,
Plaintiff

vs.

VIVIAN L. THERRELL,
Defendant

* IN THE CIRCUIT COURT OF
BALDWIN COUNTY,

*

ALABAMA

* AT LAW

*

Case No. 10,465

COUNT ONE

Plaintiff claims of the Defendant the sum of Fifty Thousand Dollars (\$50,000.00) as damages, for that heretofore and on, to-wit, October 26, 1970, the Defendant so negligently drove or operated an automobile on, along and over U.S. Highway No. 31, at or near its intersection with the Driveway of Spanish Fort Lodge, which intersection is about two (2) miles north of Spanish Fort, in Baldwin County, Alabama, U. S. Highway No. 31 being then and there a public highway in the County of Baldwin, State of Alabama, as to cause or allow said automobile to run into, against, upon or collide with an automobile which the Plaintiff was then and there driving on U. S. Highway No. 31 at said time and place, and Plaintiff avers that as a proximate result of said negligence of the Defendant as aforesaid, the Plaintiff suffered the following injuries and damages: Her neck was badly injured; her shoulders and arms were hurt; her back was injured; she was caused to suffer great physical pain and mental anguish; her nervous system was greatly impaired and shocked and permanently injured; she has suffered permanent physical injuries;

she was caused to undergo medical care, medical treatment, and x-rays; she was caused to incur expense for x-rays, medical care and treatment and medicines; she was caused to lose time from her employment and wages therefrom. She will hereafter be caused to undergo medical care and treatment and incur substantial additional expense for such services for doctors, physicians, medicines, drugs and medical supplies; and Plaintiff has suffered and will sustain future loss of earning capacity; and Plaintiff avers that all of her said injuries and damages were suffered as a proximate result of the negligence of the Defendant as aforesaid, wherefore she sues.

COUNT TWO

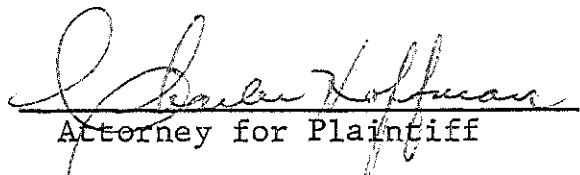
Plaintiff claims of the Defendant the sum of Fifty Thousand Dollars (\$50,000.00) as damages, for that heretofore and on, to-wit, October 26, 1970, the Defendant so negligently drove or operated an automobile northwardly on, along and over U. S. Highway No. 31, at or near its intersection with Driveway to Spanish Fort Lodge, which intersection is approximately two (2) miles north of Spanish Fort, in Baldwin County, Alabama, as to cause or allow said automobile to run into, against, or collide with an automobile being driven by the Plaintiff on U.S. Highway No. 31 at said time and place, but which was at the time it was struck by the vehicle being driven by the Defendant, at a standstill on U.S. Highway No. 31 to make a left turn into Driveway to Spanish Fort Lodge, and Plaintiff avers that as a proximate result of said negligence of the Defendant as aforesaid, the Plaintiff was injured and damaged as follows: Her neck was badly injured; her shoulders and arms were hurt; her back was

injured; she was caused to suffer great physical pain and mental anguish; her nervous system was greatly impaired and shocked and permanently injured; she has suffered permanent physical injuries; she was caused to undergo medical care, medical treatment, and x-rays; she was caused to incur expense for x-rays, medical care and treatment and medicines; she was caused to lose time from her employment and wages therefrom. She will hereafter be caused to undergo medical care and treatment and incur substantial additional expense for such services for doctors, physicians, medicines, drugs and medical supplies; and Plaintiff has suffered and will sustain future loss of earning capacity; and Plaintiff avers that all of her said injuries and damages were suffered as a proximate result of the negligence of the Defendant as aforesaid, wherefore she sues.

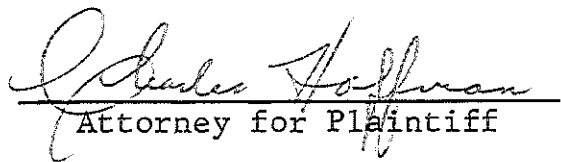
COUNT THREE

Plaintiff claims of the Defendant the sum of Fifty Thousand Dollars (\$50,000.00) as damages, for that heretofore and on, to-wit, October 26, 1970, the Defendant wantonly injured the Plaintiff by wantonly driving or operating an automobile on, along and over U.S. Highway No. 31, at or near its intersection with the Driveway to Spanish Fort Lodge, which intersection is about two (2) miles north of Spanish Fort, in Baldwin County, Alabama, U.S. Highway No. 31 being then and there a public highway in the County of Baldwin, State of Alabama, as to cause or allow said automobile to run into, against, upon, or collide with an automobile which the Plaintiff was then and there driving on U.S. Highway No. 31 at said time and place,

and Plaintiff avers that as a proximate result of said wanton injury she suffered the following injuries and damages: Her neck was badly injured; her shoulders and arms were hurt; her back was injured; she was caused to suffer great physical pain and mental anguish; her nervous system was greatly impaired and shocked and permanently injured; she has suffered permanent physical injuries; she was caused to undergo medical care, medical treatment, and x-rays; she was caused to incur expense for x-rays, medical care and treatment and medicines; she was caused to lose time from her employment and wages therefrom. She will hereafter be caused to undergo medical care and treatment and incur substantial additional expense for such services for doctors, physicians, medicines, drugs and medical supplies; and Plaintiff has suffered and will sustain future loss of earning capacity; and Plaintiff avers that all of her said injuries and damages were suffered as a proximate result of the wanton injury of the Plaintiff by the Defendant as aforesaid, wherefore she sues.


Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury of this cause.


Attorney for Plaintiff

Defendant's address:

Route 1, Box 134
Daphne, Alabama

FILED

OCT 7 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

24/10-8-71

VOL 69 PAGE 228

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 10,065

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Vivian L. Therrell

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

Vivian L. Therrell Defendant

by Betty Jane Tanner

Plaintiff

Witness my hand this 7th day of October 1971

Eunice B. Blackman Clerk

No. 10,065

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BETTY JANE TANNER

Plaintiffs

vs.

VIVIAN L. THERRELL

et. al. Box 134 DAPHNE Defendants

SUMMONS AND COMPLAINT

Filed October 7, 1971

Eunice B. Blackmon Clerk

Charles Hoffman

2401 First National Bank Bldg.

Mobile, Ala. Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

October 7 1971

Sheriff

I have executed this summons

this Oct 8 1971

by leaving a copy with

Vivian Therrell

44 Sheriff claims 44 miles

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff

BY W. C. Cook DEPUTY SHERIFF

OCT 7 1971

TAYLOR WILKINS SHERIFF

Sheriff

W. C. Cook Deputy Sheriff