	STA	TE OF	ALABAMA)	Circuit 10,240	Court, Baldwin Count	ty
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'	to appea	i una pie	· · · · · · · · · · · · · · · · · · ·		cy days month an		rank Michael
i	filed in th	e Circuit C	ourt of Baldwin C	County, State of	Alabama, at Bay	y Minette, against	
tewart,						out vill be added De	by amendment when fendant…ascertained
" "	J. V.	. Greshar	e, vào suos as	father & ner	ar Arical of	Debra Greshum, a	minor, deceased
 . P	************	•••••••	·····			, I	Plaintiff
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		Defendant lives at
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	**************************************	Sheriff
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VS	•• • • • • • • • • • • • • • • • • • •	by leaving a copy with
	Defendants	:
SUMMONS AN	D COMPLAINT	
Filed	19	
	Clerk	
;		
	Plaintiff's Attorney	, Sheriff
	STATE OF Baldwin CIRCUIT SUMMONS AN	STATE OF ALABAMA Baldwin County CIRCUIT COURT Plaintiffs vs. Defendants SUMMONS AND COMPLAINT Filed 19

J.W. GRESHAM, who sues as father and next friend of DEBRA GRESHAM, a minor, deceased

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

Plaintiff,

AL ABAMA

-V#-

FRANK MICHAEL STEWART, and JOHN DOE, and RICHARD ROE. whose names are otherwise unknown but will be added by amendment when ascertained,: Defendants.

COMP ENPAINT

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CARE ONE

Plaintiff, who sues as father and next friend of DEBRA GRESHAM, a minor, deceased, claims of the Defendants the sum of SEVENTY-FIVE THOUSAND AND NO/100 (\$75,000.00) DOLLARS, as damages, for that heretofore, on to-wit, Pebruary 19, 1971, the Defendants so negligently operated an automobile on U.S. Highway 225, a public highway in Baldwin County at or near a point 8.7 miles East of Bay Minette, Alabama, that the same was run up on or against both sides of the pavement of said Highway so that the automobile was overturned and as a proximate result thereof the Plaintiff's minor daughter, age seventeen (17), a passenger in said automobile sustained severe injuries from which she died, and Plaintiff avers that said injuries and death and said damages to Plaintiff's deceased mimor daughter was preximately caused by the aforesaid negligence of the Defendants, Wherefore Plaintiff sues.

COUNT TWO

Plaintiff, who sues as father and next friend of DEBRA GRESHAM, a minor, deceased, claims of the Defendants the sum of seventy-five thousand and No/100 (\$75,000.00) Dollars, as damages, for that heretofore, on to-wit, February 19, 1971, the Defendants so wantonly operated an automobile on U.S. Highway 225, a public highway in Baldwin County at or near a point
2.7 miles East of Bay Minette, Alabama, that the same was
run up on or against both sides of the pavement of said
Highway so that the automobile was overturned and as a
proximate result thereof the Plaintiff's minor daughter, age
seventeen (17), a passenger in said automobile sustained severe
injuries from which she died, and Plaintiff avers that said
injuries and death and said damages to Plaintiff's deceased
minor daughter was proximately caused by the aforesaid wantonness
of the Defendants, Wherefore Plaintiff sues.

Y.D. LOTT, JR., Actorney for

Plaintiff

PLAINTIFF RESPECTFULLY DEMANDS A TRIAL BY JURY.

FILED

Y.D. LOTT, JR., Altorney for

FEB 18 1972

EUNICE B. BLACKMON CIRCUIT

Frank Michael Stewart may be served at: 820 Brundidge Blvd.
Troy, Alabama 36081

J. W. GRESHAM, who sues as father and next friend of DEBRA

IN THE CIRCUIT COURT OF

GRESHAM, a minor, deceased,

BALDWIN COUNTY, ALABAMA

Plaintiff,

VS.

.

:

FRANK MICHAEL STEWART,

ET AL,

Defendants.

CASE NO. 10,240

MOTION TO REINSTATE

Comes now Y.D. Lott, Jr., Attorney for the Plaintiff herein and shows unto the Court the following:

- 1. The above casewas set down for trial several months ago and the Plaintiff was unable to attend Court because he was out of town on business. The Court was advised that he would be unable to be present but recently received notice that said case had been dismissed. The Plaintiff is very active in his business and is unable to attend court on a moment's notice but is presently ready to attend court and give testimony at the Court's convenience.
- 2. Plaintiff further wishes to withdraw his plea for a jury trial.

WHEREFORE, Plaintiff prays that this matter be reinstated on the trial docket and that the Court notify Plaintiff of a convenient date to give testimony. Your Plaintiff prays for additional relief he may be entitled to the premises considered.

JUN 10 1974

EUNICE B. BLACKMARAN CORCAGO

Y.D. LOTT, JŘ.

Attorney for Plaintiff

18th

Witness my hand this......day of.....

STATE OF ALABAMA Baldwin County	- <u> </u>	Circuit 10,240	Court, Baldwin County	
	·		TERM, 19	
	TO ANY SHERIF	F OF THE	STATE OF ALABAMA:	:
You Are Hereby Commanded to Sur			, & John Doe, & Richard Ro	e, who
names are otherwise unknown	but will be adde	d by amend	dment when ascertained,	
	• • • • • • • • • • • • • • • • • • •			** ** ** **

o appear and plead, answer or d	emur, within thirty da	ays from the	e service hereof, to the complaint	
led in the Circuit Court of Baldwin (
& John Doe, & Richard Roe,	whose names are t	inknown bu	it will be added by amendme	ent who
J. W. Gresham, who sues as	s father & next fr	riend of I	Debra Gresham, a minor, dec	ertain eased

Feb.

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STATE OF ALABAMA Baldwin County	Defendant lives at
CIRCUIT COURT	Received In Office
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	Sheriff
Plaintiffs	I have executed this summons
	this
vs.	by leaving a copy with
Defendants	
SUMMONS AND COMPLAINT	
Filed 19	
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Plaintiff's Attorney	Sheriff
X 1	
Defendant's Attorney	Deputy Sheriff

J.W. GRESHAM, who sues as father and next friend of

IN THE CIRCUIT COURT OF

DEBRA GRESHAM, a minor,

BALDWIN COUNTY

deceased

Plaintiff,

AL ABAMA

-VS-

FRANK MICHAEL STEWART, and :
JOHN DOE, and RICHARD ROE,
whose names are otherwise :
unknown but will be added
by amendment when ascertained,:
Defendants.

CASE NO. 10 240

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COMPLAINT

COUNT ONE

Plaintiff, who sues as father and next friend of DEBRA GRESHAM, a minor, deceased, claims of the Defendants the sum of SEVENTY-FIVE THOUSAND AND NO/100 (\$75,000.00) DOLLARS, as damages, for that heretofore, on to-wit, February 19, 1971, the Defendants so negligently operated an automobile on U.S. Highway 225, a public highway in Baldwin County at or near a point 8.7 miles East of Bay Minette, Alabama, that the same was run up on or against both sides of the pavement of said Highway so that the automobile was overturned and as a proximate result thereof the Plaintiff's minor daughter, age seventeen (17), a passenger in said automobile sustained severe injuries from which she died, and Plaintiff avers that said injuries and death and said damages to Plaintiff's deceased minor daughter was proximately caused by the aforesaid negligence of the Defendants, Wherefore Plaintiff sues.

COUNT TWO

Plaintiff, who sues as father and next friend of DEBRA GRESHAM, a minor, deceased, claims of the Defendants the sum of SEVENTY-FIVE THOUSAND AND NO/100 (\$75,000.00) DOLLARS, as damages, for that heretofore, on to-wit, February 19, 1971, the Defendants so wantonly operated an automobile on U.S. Highway

225, a public highway in Baldwin County at or near a point 8.7 miles East of Bay Minette, Alabama, that the same was run up on or against both sides of the pavement of said Highway so that the automobile was overturned and as a proximate result thereof the Plaintiff's minor daughter, age seventeen (17), a passenger in said automobile sustained severe injuries from which she died, and Plaintiff avers that said injuries and death and said damages to Plaintiff's deceased minor daughter was proximately caused by the aforesaid wantonness of the Defendants, Wherefore Plaintiff sues.

Y.D.LOTT, JR., Attorney for

Plaintiff

PLAINTIFF RESPECTFULLY DEMANDS A TRIAL BY JURY.

FILED

FEB 18 1972

EUNICE B. BLACKMON CIRCUIT

Y.S. LOTT, JR., Attorney for

Frank Michael Stewart may be served at: 820 Brundidge Blvd. Troy, Alabama 36081

J.W. GRESHAM, who sues as : IN THE CIRCUIT COURT OF

father and next friend of DEBRA GRESHAM, a minor, : BALDWIN COUNTY

deceased Plaintiff, : ALABAMA

~~VS-~

FRANK MICHAEL STEWART, and :
JOHN DOE, and RICHARD ROE,
whose names are otherwise :
unknown but will be added

unknown but will be added by amendment when ascertained,: CASE NO. 10, 240

Defendants.

COMPLAINT

COUNT ONE

Plaintiff, who sues as father and next friend of DEBRA GRESHAM, a minor, deceased, claims of the Defendants the sum of SEVENTY-FIVE THOUSAND AND NO/100 (\$75,000.00) DOLLARS, as damages, for that heretofore, on to-wit, February 19, 1971, the Defendants so negligently operated an automobile on U.S. Highway 225, a public highway in Baldwin County at or near a point 8.7 miles East of Eay Minette, Alabama, that the same was run up on or against both sides of the pavement of said Highway so that the automobile was overturned and as a proximate result thereof the Plaintiff's minor daughter, age seventeen (17), a passenger in said automobile sustained severe injuries from which she died, and Plaintiff avers that said injuries and death and said damages to Plaintiff's deceased minor daughter was proximately caused by the aforesaid negligence of the Defendants, Wherefore Plaintiff sues.

COUNT TWO

Plaintiff, who sues as father and next friend of DEBRA GRESHAM, a minor, deceased, claims of the Defendants the sum of SEVENTY-FIVE THOUSAND AND NO/100 (\$75,000.00) DOLLARS, as damages, for that heretofore, on to-wit, February 19, 1971, the Defendants so wantonly operated an automobile on U.S. Highway

225, a public highway in Baldwin County at or near a point 8.7 miles East of Bay Minette, Alabama, that the same was run up on or against both sides of the pavement of said Highway so that the automobile was overturned and as a proximate result thereof the Plaintiff's minor daughter, age seventeen (17), a passenger in said automobile sustained severe injuries from which she died, and Plaintiff avers that said injuries and death and said damages to Plaintiff's deceased minor daughter was proximately caused by the aforesaid wantonness of the Defendants, Wherefore Plaintiff sues.

Y.D.LOTT, JR., Attorney for

Plaintiff

PLAINTIFF RESPECTFULLY DEMANDS A TRIAL BY JURY.

FILED

Y.D. LOTT, JR., Attorney for Plaintiff

FEB 18 1972

EUNICE B. BLACKMON CIRCUIT

Frank Michael Stewart may be served at: 820 Brundidge Blvd.
Troy, Alabama 36081



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J. W.	Gresham, who sue	s as tather & next f	riend of Debra G	resham, a minor, dec
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next friend of Debra Gresham, a minor deceased	()
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FRANK MICHAEL STEWART, & JOHN DOE, & RICI whose names are otherwise unknown but wi	11 be added
by amendment when ascertained Defendants	Mark M. Slewart
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Y. D. Lott, Jr.	
Plaintiff's Attorney	Tresley Vann Sheriff
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Defendant's Attorney	Deputy Sheriff