THE STATE OF ALABAMA, BALDWIN COUNTY,

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CIRCUIT COURT

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TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

You are hereby commanded to summon Marie Lee and X, Y, and Z, the operator and the owner of the motor vehicle which collided with the automobile in which plaintiff was riding, which accident is the subject of this suit, whose true names are otherwise not known to the plaintiff, but whose true names, when ascertained, will be added by amendment, to appear within thirty days from the service of this writ, in the Circuit Court of said County, at the place of holding the same then and there to plead, answer, or demur, to the Complaint of REANIE C. ALLEN.

Witness my hand this 7 day of July, 1972.

Ernice B. Blackmon, Clerk.

C O M P L A I N T

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| REANIE C. ALLEN, | : | IN THE CIRCUIT COURT |
| Plaintiff, | : | OF BALDWIN COUNTY, ALABAMA |
| vs. | : | AT LAW |
| MARIE LEE, and X,Y,Z, the operator and the owner of the motor vehicle which collided with the automobile in which plaintiff was riding, which accident is the subject of this suit, whose true names are otherwise not known to the plaintiff, but whose true names, when ascertained, will be added by amendment, individually and jointly, | : | |
| Defendants. | : | CASE NO. 10,480 |

Plaintiff claims of the defendants, jointly and individually, the sum of THIRTY FIVE THOUSAND AND NO/100 ($35,000.00) DOLLARS as damages, for that heretofore and on, to-wit, the 18th day of July, 1971, the defendant, Marie Lee, so negligently operated a motor

vehicle she was driving on County Highway 85 in Baldwin County, Alabama, at or near its intersection with Alabama Highway 16, both of which highways are public highways in Baldwin County, Alabama, so as to negligently cause or allow said motor vehicle being driven by defendant Marie Lee to collide with a motor vehicle in which the plaintiff was riding, which was then and there on said Alabama Highway 16 at or near its intersection with said County Highway 85 in Baldwin County, Alabama, and as a proximate and direct result of the said negligence of defendant,Marie Lee, as aforesaid, the plaintiff was bruised, battered and otherwise injured; she suffered a fracture of her left shoulder; she developed an adhesive capsulitis in said left shoulder; she was caused to be hospitalized; she was made nervous and shaky and still so remains; she was otherwise injured and damaged internally and externally; she was caused to suffer great physical pain and mental anguish, still so suffers, and will so suffer in the future; and she was permanently disabled. All of the said injuries sustained by plaintiff were the proximate consequence of the aforesaid negligence of the said defendant Marie Lee, for all of which plaintiff claims damages as aforesaid.

Bert S. Nettles

BERT S. NETTLES, Attorney for Plaintiff

OF COUNSEL:
NETTLES AND COX
Attorneys at Law
2409 First National Bank Building
Mobile, Alabama

Plaintiff respectfully demands a trial by jury.

Bert S. Nettles

BERT S. NETTLES

Defendant Marie Lee may be served at her home in Foley, Alabama, where she resides with her husband, James R. Lee, or at her place of employment, the Foley Hospital, known as South Baldwin Hospital.

FILED

JUL 7 1972

EUNICE B. BLACKMON CIRCUIT CLERK

10,480

Reanie G. Allen

vs.

Marie Lee

FILED

JUL 7 1972

EUNICE B. BLACKMON CIRCUIT CLERK

Nettles & Cox

Received 7 day of July 1972
and on 8 day of July 1972
I served a copy of the within
on Marie Lee

By service on _____

TAYLOR WILKINS, Sheriff
By Michael Chaney

Sheriff claims 72 miles at
Ten Cents per mile Total $ 7.20
TAYLOR WILKINS, Sheriff
BY _____
DEPUTY SHERIFF

| | | |
|---|---|---|
| REANIE C. ALLEN, | X | |
| Plaintiff, | X | IN THE CIRCUIT COURT OF |
| | X | |
| vs. | | BALDWIN COUNTY, ALABAMA |
| | X | |
| MARIE LEE, et al., | X | AT LAW NO. 10,480 |
| Defendants. | X | |

DEMURRER

Comes Marie Lee, a Defendant in the above styled cause and demurs to the Complaint filed in said cause and assigns the following separate and several grounds:

1. That said Complaint does not state a cause of action.

2. That the place where the accident occurred is not sufficiently set out.

3. That said Complaint does not allege any duty owing by such Defendant to the Plaintiff.

4. That said Complaint does not state that such Defendant negligently allowed the motor vehicle she was driving to collide with the motor vehicle in which the Plaintiff was a passenger.

Attorneys for Marie Lee

CERTIFICATE OF SERVICE

I certify that a copy of the [illegible] pleading has been served upon [illegible] for all parties to this proceeding [illegible] mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 18 day of July, 1972

FILED

JUL 18 [illegible]

EUNICE B. BLACKMON CIRCUIT CLERK

REANIE C. ALLEN,

Plaintiff,

vs.

MARIE LEE, et al.,

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO: 10,480

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DEMURRER

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