

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WITNESS my hand, this _____ day of March, 1954.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

The Plaintiff claims of the Defendant, Harold Skipper, the sum of Two Thousand and No/100 Dollars (\$2,000.00) as damages for that heretofore on, to-wit: August 23, 1953, the Plaintiff's automobile was being operated by the Plaintiff along and upon Alabama Highway No. 3, which is a public highway in Baldwin County, Alabama, where he had a right to be, and while said automobile was being operated and driven along said public highway, at the point where the said public highway intersects Fort Morgan Parkway, an automobile which was being driven by the Defendant, Bessie R. Sartor, who was then and there an agent, servant or employee of the Defendant, Harold Skipper, and who at said time and place was acting within the line and scope of her authority as such agent, servant or employee, ran upon, over or against the automobile of the

Plaintiff, causing great damages and injuries to the Plaintiff's automobile: the top, left rear wheel, the entire body and other parts of Plaintiff's automobile were broken, bent, smashed or otherwise damaged, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the Defendant, Bessie R. Sartor, in that she negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the Plaintiff and as a proximate consequence thereof, the Plaintiff's automobile was damaged and injured as aforesaid. Plaintiff further alleges that at the time and place of the accident referred to herein the said Defendant, Bessie R. Sartor, was the agent, servant or employee of the Defendant, Harold Skipper, and was acting within the line and scope of her authority as said agent, servant or employee.

COUNT TWO

The Plaintiff claims of the Defendant, Bessie R. Sartor, the sum of Two Thousand and No/100 Dollars (\$2,000.00) as damages for that heretofore on, to-wit: August 23, 1953, the Plaintiff's automobile was being operated by the Plaintiff along and upon Alabama Highway No. 3, which is a public highway in Baldwin County, Alabama, where he had a right to be, and while said automobile was being operated and driven along said public highway, at the point where the said public highway intersects Fort Morgan Parkway, an automobile which was being driven by the Defendant, Bessie R. Sartor, ran upon, over or against the automobile of the Plaintiff, causing great damages and injuries to the Plaintiff's automobile: the top, left rear wheel, the entire body and other parts of Plaintiff's automobile were broken, bent, smashed or otherwise damaged, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the Defendant, Bessie R. Sartor, in that she negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the Plaintiff and as a proximate consequence thereof, the Plaintiff's automobile was damaged and injured as aforesaid.

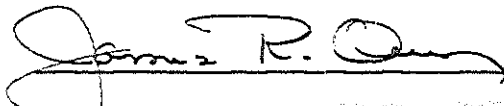
COUNT THREE

The Plaintiff claims of the Defendant, Harold Skipper, the sum of Twenty Five Thousand and No/100 Dollars (\$25,000.00) as damages for that heretofore on, to-wit: August 23, 1953, the Plaintiff's automobile was being operated by the Plaintiff along and upon Alabama Highway No. 3, which is a public highway in Baldwin County, Alabama, where he had a right to be, and while said automobile was being operated and driven along said public highway at the point where it intersects Fort Morgan Parkway, an automobile which was being driven by the Defendant, Bessie R. Sartor, who was then and there an agent, servant or employee of the Defendant, Harold Skipper, and who at said time and place was acting within the line and scope of her authority as said agent, servant or employee of the said Defendant, Harold Skipper, ran upon, over or against the automobile of the Plaintiff and as the result of said collision, Plaintiff's body was bruised, mutilated and injured; he was rendered unconscious for a long period of time, he was bruised and injured in his face, head, and other parts of his body; his right shoulder was seriously bruised and crippled; he was made sick and sore and has suffered and is suffering excruciating mental pain and anguish, and he will be partially disabled and incapacitated for the remainder of his life; his health and physical stamina were permanently impaired and he was put to much trouble, expense, annoyance, inconvenience, and loss of time in and about an effort to heal and cure his said wounds and injuries. Plaintiff alleges that all of his injuries and damages set forth above were proximately caused by the negligence of Bessie R. Sartor, who was then and there the servant, agent or employee of the Defendant, Harold Skipper, and who was then and there in charge of the said automobile for the Defendant, Harold Sartor, and acting within the line and scope of her authority as said servant, agent or employee of the Defendant, Harold Skipper, in this, that the said servant, agent or employee negligently operated said automobile at the time and place of the collision.

COUNT FOUR

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The Plaintiff claims of the Defendant, Bessie R. Sartor, the sum of Twenty Five Thousand and No/100 Dollars (\$25,000.00) as damages for that heretofore on, to-wit: August 23, 1953, the Plaintiff's automobile was being operated by the Plaintiff along and upon Alabama Highway No. 3, which is a public highway in Baldwin County, Alabama, where he had a right to be, and while said automobile was being operated and driven along said public highway at the point where it intersects Fort Morgan Parkway, an automobile which was being driven by the Defendant, Bessie R. Sartor, ran upon, over or against the automobile of the Plaintiff and as the result of said collision, Plaintiff's body was bruised, mutilated and injured; he was rendered unconscious for a long period of time, he was bruised and injured in his face, head, and other parts of his body; his right shoulder was seriously bruised and crippled; he was made sick and sore and has suffered and is suffering excruciating mental pain and anguish, and he will be partially disabled and incapacitated for the remainder of his life; his health and physical stamina were permanently impaired and he was put to much trouble, expense, annoyance, inconvenience, and loss of time in and about an effort to heal and cure his said wounds and injuries. Plaintiff alleges that all of his injuries and damages set forth above were proximately caused by the negligence of the Defendant, Bessie R. Sartor, in this, that the said Defendant negligently operated said automobile at the time and place of the said collision.


Attorney for Plaintiff.

FILED

3-16-54

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

NO 22 3

WILLIAM KENNETH ARANT
Plaintiff.

- VS.

HAROLD SKIPPER AND
BESSIE R SARTOR,ts.
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY ALABAMA
AT LAW

FILED

MAR 16 1954
ALICE L. DUCH, Clerk

JAMES R OW N
ATTORNEY-AT-LAW
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