

2455

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ROBERT A. SANCA and GULF SAUSAGE COMPANY, a partnership composed of James A. Sanca Jr., Robert A. Sanca and Richard L. Sanca, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Mary West.

WITNESS my hand this 30 day of November, 1954.

W. J. R. R. R.
CLERK

MARY WEST

PLAINTIFF

VS

ROBERT A. SANCA and GULF
SAUSAGE COMPANY, a partnership
composed of JAMES A. SANCA JR.,
ROBERT A. SANCA, AND RICHARD
L. SANCA,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

1.

The Plaintiff, Mary West, claims of the Defendants the sum of FIFTEEN THOUSAND (\$15,000.00) DOLLARS as damages for that heretofore on to-wit, December 11, 1953, the Plaintiff's son Jack West, a minor, was riding in an automobile being operated in a southerly direction along and upon Alabama Highway No. 3; a public highway in Baldwin County, Alabama, a place where he had a right to be; at a point in the city limits of Robertsedale, Baldwin County, Alabama, where Ohio Street intersects Alabama Highway No. 3; that at said time and place Robert A. Sanca who was driving his automobile in a westerly direction on Ohio Street, so negligently operated his automobile as to cause it to run into or against the automobile Jack West was riding in; and as the proximate result thereof Jack West was negligently injured as follows: His face was lacerated, bruised and torn; his eyesight was impaired and permanently impaired; his face was disfigured; his skull was fractured; he was caused to have repeated fainting and blackout spells that are of a permanent nature; he was caused to suffer much mental and physical pain, and Plaintiff avers that as the proximate result and consequence of the

injuries to her said son the Plaintiff was caused to incur considerable expense for medicine, surgical and hospital treatment, the taking of X-rays, nurses attention, and doctors in and about the treatment of her said son, and will probably have to incur further expenses in the future, and loss and continues to lose the society and services of her said son, all to the loss of the Plaintiff in the aforesaid amount.

2.

The Plaintiff, Mary West, claims of the Defendants the sum of FIFTEEN THOUSAND (\$15,000.00) DOLLARS as damages for that heretofore on to-wit, December 11, 1953, the Plaintiff's son Jack West, a minor, was riding in an automobile being operated in a southerly direction along and upon Alabama Highway No. 3; a public highway in Baldwin County, Alabama, a place where he had a right to be, at a point in the city limits of Robertsedale, Baldwin County, Alabama, where Ohio Street intersects Alabama Highway No. 3; that at said time and place the Defendant, Gulf Sausage Company, a partnership composed of James A. Sanca Jr., Robert A. Sanca and Richard L. Sanca, acting by and through Robert A. Sanca, their agent, servant or employee who was then and there acting within the line and scope of his employment as such was driving his automobile in a westerly direction, on Ohio Street, so negligently operated his automobile as to cause it to run into or against the automobile Jack West was riding in; and as a proximate result thereof Jack West was negligently injured as follows: his face was lacerated, bruised and torn, his eyesight was impaired and permanently impaired; his face was disfigured; his skull was fractured; he was caused to have fainting and black-out spells that are of a permanent nature; and Plaintiff avers that as the proximate result and consequence of the injuries to her said son the Plaintiff was caused to incur considerable expense for medicine, surgical and hospital treatment, the taking of X-rays, nurses attention and doctors in and about the treatment of her said son, and will probably have to incur further expenses in the future, and loss and continues to lose the society and services of her said son, all to the loss of the Plaintiff in the aforesaid amount.

Walters & Brantley

BY: Julius M Brantley
Attorneys for the Plaintiff

The Plaintiff demands a trial by jury.

FILED

11-30-54

ALICE J. DUCK, Clerk

Walters & Brantley

BY: Julius M Brantley
Attorneys for the Plaintiff