

JAMES H. CRAIG)	IN THE CIRCUIT COURT
Plaintiff)	OF BALDWIN COUNTY,
VS)	ALABAMA
JUNIUS COLEMAN)	AT LAW
Defendant)	NO.

2459

COUNT ONE

The plaintiff claims of the defendant the sum of Twenty-Five Thousand and No/100 Dollars (\$25,000.00) as damages for that heretofore and on, to-wit, the 15th day of October, 1954, the defendant so negligently operated the automobile he was driving westwardly on U. S. Highway 90 at a point, to-wit, 1.1 mile east of the intersection of said U. S. Highway 90 with Alabama Highway 104, which said highway at said point is a public highway in Baldwin County, Alabama, as to cause or allow the same to run into, upon or against the automobile which the plaintiff was driving, and as a direct and proximate result of said negligence, the plaintiff was seriously and permanently injured, he received multiple contusions and abrasions about his body, a severe laceration of his chin, fractures of two ribs, his chest was injured and his right lung was injured, he received injuries to his back and legs, his pelvic bone was fractured, and he was caused to incur great sums for hospital bills, doctors' bills, drugs, x-rays, medicines and nurses in and about the treatment of his injuries, and he was caused to lose great sums in wages due to his inability to work and earn a livelihood, hence this suit.


COUNT TWO

The plaintiff claims of the defendant the sum of Twenty-Five Thousand and No/100 Dollars (\$25,000.00) as damages for that heretofore and on, to-wit, October 15, 1954, the defendant wilfully or wantonly injured the plaintiff by wilfully or wantonly driving his automobile westwardly on U. S. Highway 90 at a point, to-wit, 1.1 miles east of the intersection of said Highway 90 with Alabama Highway 104, which said highway at said point is a public highway

in Baldwin County, Alabama, so as to cause the same to run into, upon or against the automobile which the plaintiff was driving eastwardly on said highway at said time and place and as a direct and proximate result thereof the plaintiff was seriously and permanently injured, he received multiple contusions and abrasions about his body, a severe laceration of his chin, fractures of two ribs, his chest was injured and his right lung was injured, he received injuries to his back and legs, his pelvic bone was fractured, and he was caused to incur great sums for hospital bills, doctors' bills, drugs, x-rays, medicines and nurses in and about the treatment of his injuries, and he was caused to lose great sums in wages due to his inability to work and earn a livelihood, hence this suit.

TONSMEIRE & HODNETTE


By


Attorneys for Plaintiff

The plaintiff demands a trial of this cause by jury.

TONSMEIRE & HODNETTE

By


Attorneys for Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 2459

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JUNIUS COLEMAN

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-----

JUNIUS COLEMAN

-----, Defendant-----

by JAMES H. CRAIG

-----, Plaintiff-----

Witness my hand this 1st day of December 1954

Archie W. Duke, Clerk