

STATE OF ALABAMA  
BALDWIN COUNTY

SUMMONS

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon James Elliot Bowen, 310 Criterion Street, Prichard, Alabama, to appear, plead, answer or demur within thirty days from service hereof to the complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, Alabama, against James Elliot Bowen by Steven E. Johnson

Witness my hand this 13 day of January, 1956.

\*\* Wingfield  
Clerk

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COMPLAINT

STEVEN E. JOHNSON  
Plaintiff

vs.

JAMES ELLIOT BOWEN  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW.

CASE NO. \_\_\_\_\_

COUNTYONE

The plaintiff claims of the defendant the sum of \$3500.00 as damages for that heretofore on to-wit January 15, 1955, the plaintiff's wife was riding in and automobile on public highway U. S. 90 at or near a point approxiametly 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway in Baldwin County, Alabama, where she had a right to be, when the defendant negligently ran an automobile upon or aginst the automobile in which the plaintiff's wife was riding and by reason thereof and as a proximate result and consequence of defendants negligent act, the plaintiff's wife received severe personal injuries and as a proxiamte result and consequence of the defendant's negligent act causing said injuries to the plaintiff's wife, the plaintiff was caused to incur considerable expenses for medical treatment; for an ambulance; for surgical and hospital treatment; for the taking of x--rays, all in and about the treatment of his wife for said injuries; And the plaintiff further avers that as a result and consequence of the defendants said negligent act causing said injuries to the plaintiff's wife, he was caused to incur expenses for a house-keeper and that the plaintiff loss for a long period of time the society, consortuim and services of his wife, for all of which the plaintiff claims damages, hence this suit.

COUNT TWO

The plaintiff claims the further sum of the defendant of \$3500.00 as damages for that heretofore to-wit, on January 15 1955, the plaintiff's wife was riding in an automobile on public highway U. S. 90 at or near a point approxiamently 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway in Baldwin County, Alabama, where she had a right to be, when the defendant wilfully and wantonly ran an automobile into, upon or against the automobile in which the plaintiff's wife was riding and by reason thereof and as a proxiamate result and consequence of said wilfull and wanto act, the defendant wilfully and wantonly in--jured the plaintiff's wife, and the plaintiff avers that as a proximate results and consequence of the defendants wilful and wanton act and injury to the ~~defendant's~~ plaintiff's wife, the plaintiff was caused to incur considerable expenses for the following: ambulance; medical, surgical and hospital expenses; hiring of a housekeeper, all in and about the treatment of his

wife for said injuries. The plaintiff further avers that as a proximate result and consequence of the defendant's willful and wanton act and injury to his said wife, he lost the society consortium and services of his wife for a long period of time, for all of which he claims damages, hence this suit.

#### COUNT THREE

The plaintiff claims of the defendant the further sum of \$3000.00 as damages for that heretofore on to-wit: January 15, 1955, the plaintiff was riding in an automobile on public highway U. S. 90 at or near a point approximately 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway, in Baldwin County, Alabama, where he had a right to be, when the defendant negligently ran an automobile into, upon or against the automobile in which the plaintiff was riding, and by reason of such negligence and as a proximate result and consequence thereof the plaintiff was severely injured in this to-wit: he was made sick, sore and lame; he was bruised and injured; his limbs and body were lacerated, bruised and injured; he was internally injured; he was permanently injured; he suffers and continues great mental anguish and physical pain; he lost much time from his work; he was forced to incur great medical expenses for medical treatment, hospital services, nurses hire and the purchase of medicines and drugs in and about the treatment of his said injuries; for all of which he claims damages as aforesaid.

#### COUNT FOUR

The plaintiff claims of the defendant the further sum of \$4000.00 as damages for that heretofore on to-wit: January 15, 1955, the plaintiff was riding in an automobile on public highway U. S. 90 at or near a point approximately 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway, in Baldwin County, Alabama, where he had a right to be, when the defendant willfully and wantonly drove an automobile into, upon, or against the automobile in which the plaintiff was riding and by reason thereof and as a proximate results and consequence of said wanton and willful act the defendant willfully and wantonly injured the plaintiff severely in this to-wit: he was made sick, sore and lame; he was bruised and injured; his limbs and body was lacerated, bruised and injured; he was internally injured; he was permanently injured; he suffered and continues to suffer great mental anguish and physical pain; he lost much time from his work; he was forced to incur great medical expenses for medical treatment, hospital services, nurses hire and the purchase of medicines and drugs in and about the treatment of his said injuries; for all of which he claims damages hence this suit.

*Arthur C. Epperson*  
Attorney for Plaintiff

STATE OF ALABAMA  
BALDWIN COUNTY

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Witness my hand this 13<sup>th</sup> day of January, 1956.

\*\* Alvin J. Duck  
Clerk

\*\*\*\*\*

COMPLAINT

STEVEN E. JOHNSON	)	
Plaintiff	)	IN THE CIRCUIT COURT OF
	)	
vs.	)	BALDWIN COUNTY, ALABAMA
	)	
	)	AT LAW.
JAMES ELLIOT BOWEN	)	
DEFENDANT	)	CASE NO. _____

COUNTYONE

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wife for said injuries. The plaintiff further avers that as a proximate result and consequence of the defendant's willful and wanton act and injury to his said wife, he lost the society consortium and services of his wife for a long period of time, for all of which he claims damages, hence this suit.

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Attorney for Plaintiff