

SUMMONS

STATE OF ALABAMA  
BALDWIN COUNTY

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 Lena Johnson.

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

Quincy H. Smith  
Clerk

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COMPLAINT

|                    |   |                         |
|--------------------|---|-------------------------|
| LENA JOHNSON       | ) |                         |
| Plaintiff          | ) | IN THE CIRCUIT COURT OF |
|                    | ) |                         |
| VS.                | ) | BALDWIN COUNTY, ALABAMA |
|                    | ) |                         |
| JAMES ELLIOT BOWEN | ) | AT LAW                  |
| Defendant          | ) |                         |
|                    | ) | CASE _____              |

COUNT ONE

The plaintiff claims of the defendant the sum of \$3000.00 as damages for that heretofore to-wit: January 15, 1955, the plaintiff was riding in an automobile on public highway U. S. 90 approxiametly 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway in Baldwin County, Alabama, where she had a right of being, when the defendant ran negligently 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: she was made sick sore and lame, she suffered multiple contusions of the arms, body and legs; her leg was fractured; she suffered acute shock; she suffered and continues to suffer great physical pain; she suffered and continues to suffer great mental anguish; she was internally injured and she was permanently injured; she was rendered less able to perform her work and labors which condition continues to exist and will so continue to exist for an indeterminate period of time, for all of which she claims damages, hence this suit.

COUNT TWO

The plaintiff claims of the defendant the further sum of \$3500.00 as damages for that heretofore on to-wit: the 15th day of January, 1955, the plaintiff was riding in an automobile on public highway U. S. 90 at a point where she had a right to be on said highway approxiametly 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway in Baldwin County, Alabama, at which time and place the defendant wilfully and wantonly injured the plaintiff by wilfully and wantonly driving an automobile into, upon or against the automobile in which the plaintiff was riding, and by reason thereof and as a proximate result and consequence of said wilful and wanton act the plaintiff suffered severe injuries in this to-wit: she was made sick, sore and lame; she suffered multiple contusions of the arms, body, and legs; her leg was fractured; she suffered acute shock; she suffered and continues to suffer great physical pain and mental anguish; she was internally injured and permanently injured; she was rendered less able to perform her work and labors which condition continues to exist and will so continue to exist for an indeterminate period of time, for all of which she claims damages hence this suit.

Arthur C. Esperson  
Attorney for Plaintiff

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Witness my hand this 13th day of January, 1956.

W. J. Duck  
Clerk

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COMPLAINT

LENA JOHNSON  
Plaintiff

VS.

JAMES ELLIOT BOWEN  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE \_\_\_\_\_

COUNT ONE

The plaintiff claims of the defendant the sum of \$3000.00 as damages for that heretofore to-wit: January 15, 1955, the plaintiff was riding in an automobile on public highway U. S. 90 approximately 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway in Baldwin County, Alabama, where she had a right of being, when the defendant ran negligently 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: she was made sick sore and lame, she suffered multiple contusions of the arms, body and legs; her leg was fractured; she suffered acute shock; she suffered and continues to suffer great physical pain; she suffered and continues to suffer great mental anguish; she was internally injured and she was permanently injured; she was rendered less able to perform her work and labors which condition continues to exist and will so continue to exist for an indeterminate period of time, for all of which she claims damages, hence this suit.

COUNT TWO:

The plaintiff claims of the defendant the further sum of \$3500.00 as damages for that heretofore on to-wit: the 15th day of January, 1955, the plaintiff was riding in an automobile on public highway U. S. 90 at a point where she had a right to be on said highway approximately 300 feet East of the Tensaw River Bridge on the Mobile Bay Causeway in Baldwin County, Alabama, at which time and place the defendant wilfully and wantonly injured the plaintiff by wilfully and wantonly driving an automobile into, upon or against the automobile in which the plaintiff was riding, and by reason thereof and as a proximate result and consequence of said wilful and wanton act the plaintiff suffered severe injuries in this to-wit: she was made sick, sore and lame; she suffered multiple contusions of the arms, body, and legs; her leg was fractured; she suffered acute shock; she suffered and continues to suffer great physical pain and mental anguish; she was internally injured and permanently injured; she was rendered less able to perform her work and labors which condition continues to exist and will so continue to exist for an indeterminate period of time, for all of which she claims damages hence this suit.

Arthur C. Gifferson  
Attorney for Plaintiff