

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LILLIE L. McDILL and W. M. McDILL 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 same, then and there to answer the complaint of MAE HARRIS PHILLIPS.

Witness my hand, this the 16 day of April, 1956.

Alice J. Dues  
CLERK

MAE HARRIS PHILLIPS,  
Plaintiff,

VS

LILLIE L. McDILL and  
W.M. McDILL  
Defendants

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 2918

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1. The Plaintiff claims of Defendants the sum of FIVE-THOUSAND (\$5,000.00) DOLLARS for that on to-wit, August 27, 1955 the Defendants so negligently operated a motor vehicle on the U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said motor vehicle to run into, over or against the automobile in which the Plaintiff was riding which said automobile of the Plaintiff was then and there being operated in a lawful and proper manner on said highway, and as a proximate result of such negligence the Plaintiff was injured in that her neck and shoulders were made sore and bruised and her legs and body were injured causing her to incur expenses for treatment and medicine, and to have great pain and suffering, hence this suit.

2. The Plaintiff claims of Defendants the sum of FIVE-THOUSAND (\$5,000.00) DOLLARS as damages for that on to-wit, August 27, 1955 they so negligently allowed or permitted one Albert Lee Martin to operate a motor vehicle belonging to the Defendants well knowing that the said Albert Lee Martin was a minor under the age of sixteen years, or that the said Albert Lee Martin was intoxicated at that time and place, or was otherwise incapable

or incompetent to operate such a motor vehicle, and that the said Albert Lee Martin did so negligently operate such motor vehicle or operate such motor vehicle in such an incompetent, negligent or reckless manner on U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said vehicle of Defendants to run into, over or against the automobile in which the Plaintiff was riding which automobile of the Plaintiff was then and there being operated in a lawful and proper manner on the said Highway, and as a proximate result of the said negligent acts of the Defendants the Plaintiff was injured in that her neck and shoulders were made sore and bruised and her legs and body were injured causing her to incur expenses for treatment and medicine, and to have great pain and suffering, hence this suit.

3. The Plaintiff claims of Defendants the sum of FIVE-THOUSAND (\$5,000.00) DOLLARS for that on to-wit, August 27, 1955 the Defendants so willfully and wantonly operated a motor vehicle on the U.S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said motor vehicle to run into, over or against the automobile in which the Plaintiff was riding which said automobile of the Plaintiff was then and there being operated in a lawful and proper manner on said highway, and as a proximate result of such willfulness and wantonness the Plaintiff was injured in that her neck and shoulders were made sore and bruised and her legs and body were injured causing her to incur expenses for treatment and medicine, and to have great pain and suffering, hence this suit.

4. The Plaintiff claims of Defendants the sum of FIVE-THOUSAND (\$5,000.00) DOLLARS as damages for that on to-wit, August 27, 1955 they so willfully and wantonly allowed or permitted one Albert Lee Martin to operate a motor vehicle belonging to the Defendants well knowing that the said Albert Lee Martin was a minor under the age of sixteen years, or that the said Albert Lee Martin was intoxicated at that time and place, or was otherwise incapable or incompetent to operate such a motor vehicle, and that the said Albert Lee Martin did so willfully and wantonly operate such motor

vehicle and did operate such motor vehicle in such an incompetent and reckless manner on U. S. Highway 31 at a point approximately three and one-half miles South of the Court House in Bay Minette, Alabama as to cause or allow the said vehicle of Defendants to run into, over or against the automobile in which the Plaintiff was riding which said automobile of the Plaintiff was then and there being operated in a lawful and proper manner on the said Highway, and as a proximate result of <sup>the said</sup> willfull and wanton acts the Plaintiff was injured in that her neck and shoulders were made sore and bruised and her legs and body were injured causing her to incur expenses for treatment and medicine, and to have great pain and suffering, hence this suit.

W. C. Haysen  
Attorney for Plaintiff