

3151

February 27, 1957

MARGARET ANN BAGGETT, a minor, suing by EDITH
BAGGETT HOWELL, as her next friend, Plaintiff
VS
WILLIAM G. RICHARDSON, Defendant

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

CASE NO. 3151

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW:

I, Mary Texas Hurt, Secretary of State, hereby certify that on February 25, 1957
I sent by registered mail in an envelope addressed as follows:

" William G. Richardson
43 Dallas Manor
Chattanooga, Tennessee"

"Registered Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of
the State of Alabama in words and figures as follows:

" William G. Richardson
43 Dallas Manor
Chattanooga, Tennessee

You will take notice that on February 25, 1957 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: MARGARET ANN BAGGETT, a minor, suing by EDITH BAGGETT HOWELL,
as her next friend, Plaintiff VS WILLIAM G. RICHARDSON, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 3151 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and
effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 25
day of February 1957

Enclosure (1)

(Signed) Mary Texas Hurt
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed
as above set forth had attached to it a true copy of the summons and complaint in the above-styled
cause.

I further certify that on February 27, 1957 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Chattanooga, Tennessee
on Feb 26 1957

WITNESS MY HAND and the Great Seal of the State of Alabama this the 27 day
of February 1957

Mary Texas Hurt Garner
Mary Texas Hurt
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Honorable N. C. Stone
Chason & Stone, Attorneys at Law
Arcade Building
Bay Minette, Alabama

3/5-1

MARGARET ANN BAGGETT, a minor,
suing by EDITH BAGGETT HOWELL,
as her next friend,

Plaintiff,

vs.

WILLIAM G. RICHARDSON,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

AFFIDAVIT

FILED
FEB 21 1957
AUGIE L. BUCK, Clerk

LAW OFFICES
CHASON & STONE
Bay Minette, Alabama

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William G. Richardson 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 Margaret Ann Baggett, a minor, suing by Edith Baggett Howell, as her next friend.

Witness my hand this 21 day of February, 1957.

W. G. Richardson
Clerk.

MARGARET ANN BAGGETT, a minor,
suing by EDITH BAGGETT HOWELL,
as her next friend,

Plaintiff,

vs.

WILLIAM G. RICHARDSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant Fifty Thousand Dollars (\$50,000.00) as damages for that on heretofore, to-wit: August 3, 1956, at about 12:15 o'clock A. M., at a point approximately two (2) miles East of the Malbis Plantation on U. S. Highway #90, a public highway in Baldwin County, Alabama, the Defendant, William G. Richardson, so negligently operated a motor vehicle as to cause or allow the same to run into and collide with a motor vehicle in which the Plaintiff, Margaret Ann Baggett, a minor, was riding as a passenger and as a proximate consequence and result of the negligence of the Defendant aforesaid, the Plaintiff, Margaret Ann Baggett, was seriously and permanently injured in this: She suffered a compound fracture of the right shoulder, a compound fracture of the right elbow, a fracture of the left femur above the knee, she

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suffered abdominal and intestinal injuries, she suffered from shock, she suffered multiple contusions and multiple lacerations, she suffered great pain and mental anguish, she was required to be confined in a hospital for about three (3) to four (4) weeks, she was required to remain in a cast, she was permanently scarred and disfigured and her right arm and left leg were permanently disabled and injured, all to the damage of the Plaintiff, aforesaid, wherefore she brings this suit and asks judgment in the above amount.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Fifty Thousand Dollars (\$50,000.00) as damages for that on, heretofore, to-wit: August 3, 1956, at 12:15 o'clock A. M., at a point approximately two (2) miles East of the Malbis Plantation on U. S. Highway #90, a public highway in Baldwin County, Alabama, the Defendant, William G. Richardson, wantonly injured the Plaintiff, Margaret Ann Baggett, a minor, by then and there wantonly driving a motor vehicle into, upon and against a motor vehicle in which the Plaintiff, Margaret Ann Baggett, was riding as a guest and as a proximate consequence and result of the wantonness of the Defendant aforesaid, the Plaintiff was seriously and permanently injured in this: She suffered a compound fracture of the right shoulder, a compound fracture of the right elbow, a fracture of the left femur above the knee, she suffered from shock, she suffered multiple contusions and multiple lacerations, she suffered great pain and mental anguish, she was required to be confined in a hospital for about three or four weeks, she was required to remain in a cast, she was permanently scarred and disfigured and her right arm and left leg were permanently disabled and injured, all to the damage of the Plaintiff, aforesaid, wherefore she brings this suit and asks judgment in the above amount.

CHASON & STONE

By: Melvin C. Stone
Attorneys for Plaintiff

Plaintiff respectfully demands
a trial of this cause by jury.

CHASON & STONE

By: Melvin C. Stone
Attorneys for Plaintiff

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RECEIVED IN OFFICE

FEB 22 1957

M. S. BUTLER, Sheriff

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Executed by serving.....copies of
the within on Mary Texas Hurt,
Secretary of State of The State of
Alabama.

This the 25 day of Feb 1957

Sheriff of Montgomery County

M. S. Butler,

By [Signature] D. S.

The Sheriff claims.....2

miles at 10c per mile for a total
of \$.....20

M S Butler, Sheriff
Montgomery County, Ala.

315-1

MARGARET ANN BAGGETT, a minor,
suing by EDITH BAGGETT HOWELL,
as her next friend,

Plaintiff,

vs.

WILLIAM G. RICHARDSON,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

*SUMMONS AND COMPLAINT

FILED

FEB. 21 1957

ALICE I. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA