

S U M M O N S

STATE OF ALABAMA, §
 § TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. §

You are hereby commanded to summon Ray E. Loper Lumber Co., Inc., a corporation to appear within thirty days from the service of this writ in the circuit court of Baldwin County, Alabama, at the place of holding the same, then and there to answer the complaint of Lamar Nicholson.

WITNESS my hand this 16 day of April, 1957.

Beice J. Herick
Clerk

C O M P L A I N T

LAMAR NICHOLSON
PLAINTIFF

VS

RAY E. LOPER LUMBER CO., INC.,
a Corporation
DEFENDANT

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

C O U N T C N E

The Plaintiff claims of the Defendant the sum of to-wit: FIVE THOUSAND (\$5000.00) DOLLARS as damages, for that, heretofore, on to-wit: January 22, 1957 about 7:20 P. M. that Robert Money, the agent servant or employee of Ray E. Loper Lumber Co., Inc., a corporation so negligently operating an automobile truck and trailer loaded with logs on to-wit: property under the control of the said defendant corporation, to-wit: approaching the unloading ramp of the said defendant corporation, for logs or poles that two of the logs rolled off the said trailer truck and fell over, upon or against the said plaintiff and as a proximate consequence thereof plaintiff was greatly bruised, sprained and his left leg was broken between the knee and the ankle and he was permanently injured, and he was caused to suffer great physical and mental pain and anguish and his physical condition was greatly impaired and shocked and he was caused to incur expenses in and about curing and healing his said injuries and he was caused to lose time from his work. And plaintiff avers that he suffered said injuries and consequent damages as a

proximate consequence of the aforesaid negligence of the defendant.

Lamar Nelson
Plaintiff

Plaintiff requests a trial by jury.

LeDier Thompson
Attorney for Plaintiff