

COMPLAINT

RAYFUS WOODS	)	
	)	IN THE CIRCUIT COURT OF
PLAINTIFF	)	
	)	BALDWIN COUNTY, ALABAMA
VS.	)	
	)	IN LAW
WILLIS R. WOLFE	)	NO. 3376
	)	
DEFENDANT	)	

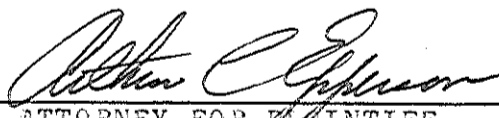
The plaintiff claims of the defendant the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit: On October 31, 1956, the plaintiff was a passenger in an automobile which was lawfully being operated along and upon a public highway, viz: On U. S. Highway 90, in Baldwin County, Alabama, approximately 11½ (eleven and one-half) miles East of the city limits of Robertsdale, Baldwin County, Alabama, where the plaintiff and said automobile had a right to be, the agent, servant, or employee of the defendant in charge or control of the operation of a truck belonging to the defendant, while acting within the line or scope of his employment as such agent, servant, or employee negligently ran said truck upon, over, or against the automobile in which the plaintiff was a passenger causing great personal injuries and damages to the plaintiff in this, to-wit: He was knocked to the floor; he was rendered semi-unconscious; he was made sick, sore, and lame; he was bruised and lacerated; he suffered a number of contusions and abrasions on his left and right knees, thighs, hips, and left groin; his arms and legs were permantly stiffened; he suffered and continues to suffer great mental anguish and physical pain.

The plaintiff avers that by reason of said injuries which he sustained in said collision he was compelled to go to a hospital, employ surgeons and doctors at great expense, which said expense now continues in an amount not yet known by plaintiff; and the plaintiff further alleges that he has lost much time from his labors,

that his capacity for work has been greatly reduced, that such condition continues to exist and will so continue to exist for an indeterminate period of time; that his services are reasonably worth the sum of Seven Hundred Fifty Dollars (\$750.00) a month and he avers that same are reasonable and claims of the defendant such sums as shall compensate him for said loss of time from his work and labor.

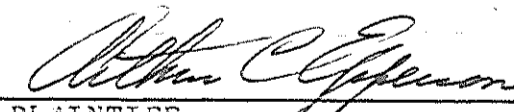
The plaintiff further avers that said injuries and damages were the approximate result of the negligence of the defendant's agent or employee while acting within the line or scope of his employment.

The plaintiff further avers that the defendant, WILLIS R. WOLFE is and was on the date of said collision, to-wit: The 31st day of October, 1956, a non-resident of the State of Alabama, and that the present Post Office address of the defendant, WILLIS R. WOLFE, is Marion, Virginia, and the plaintiff prays that service or process upon the defendant, WILLIS R. WOLFE, may be had in accordance with the Provisions of the Code of 1940, Title 7, Section 199.

  
ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.

*Filed Oct. 31, 1957*

  
PLAINTIFF

*Executed Nov. 4, 1957*

*By service on Sec. of State*

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 3376

TERM, 1957

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLIS R. WOIFE

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

WILLIS R. WOIFE, Defendant

by Rayfus Woods, Plaintiff

Witness my hand this 31 day of October 1957

1957

W. J. Duck, Clerk

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**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

RAYFUS WOODS

Plaintiffs

vs.

WILLIS R. WOIFE

Defendants

**SUMMONS and COMPLAINT**

Filed Oct. 31, 1957

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

1607

Defendant lives at
RECEIVED IN OFFICE
NO RECEIVED IN OFFICE
M. S. BUTLER <u>10/31</u> , 19 <u>57</u>

, Sheriff

I have executed this summons

this \_\_\_\_\_, 19.....

by leaving a copy with

Executed by serving 3 copies of  
the within on Mary Texas Hurt,  
Secretary of State of The State of  
Alabama.

(This the 4 day of Nov 1957)

Sheriff of Montgomery County

M. S. Butler,

By Goodman D. S.

The Sheriff claims 2  
miles at 10c per mile for a total  
of \$ 2.00

M. S. Butler, Sheriff  
Montgomery County, Ala.

Sheriff

Deputy Sheriff



MARY TEXAS HURT  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY 4, ALABAMA

November 21, 1957

Honorable Arthur C. Epperson  
Attorney at Law  
Foley, Alabama

Re: Rayfus Woods VS Willis R. Wolfe

Dear Mr. Epperson:

Please refer to your file in the above-styled cause and be advised that on November 4, 1957, I sent by registered mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Willis R. Wolfe  
Marion,  
Virginia

On November 20, 1957, this letter (Registered No. 56391 ) was returned to me with reason for non-delivery given as "UNCLAIMED."

Will you please advise me as to any further efforts you wish me to make in perfecting this service.

Sincerely yours,

*Mary Texas Hurt Garner*

Mary Texas Hurt Garner  
Secretary of State

*Jamie L. Pettigrew*

By: Jamie L. Pettigrew  
Administrative Assistant

cc: Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama