

DERMATOLOGY
K. B. SNIDER, M. D.

GENERAL, THORACIC AND
CARDIOVASCULAR SURGERY
G. W. MORSE, M. D.
F. P. CASSIDY, M. D.
J. R. EMLET, M. D.

GYNECOLOGY AND
OBSTETRICS

A. E. MOCK, M. D.
F. D. HODNETTE, M. D.
O. G. NIX, M. D.
W. M. COLMER, JR., M. D.

INTERNAL MEDICINE

W. P. HIXON, M. D.
E. T. WHITE, JR., M. D.
B. BEIDLEMAN, M. D.
H. E. HERRING, JR., M. D.
J. W. FLEMING, M. D.

OPHTHALMOLOGY

V. L. SMITH, M. D.
L. V. TYLER, JR., M. D.

THE MEDICAL CENTER CLINIC

1750 NORTH PALAFOX STREET
PENSACOLA, FLORIDA

June 13, 1957

ORTHOPEDICS
L. C. FISHER, JR., M. D.
P. G. BATSON, JR., M. D.

OTOLARYNGOLOGY
E. G. WOLF, M. D.
H. K. TIPPINS, M. D.

PEDIATRICS
A. W. WHITE, M. D.
E. V. ANDERSON, M. D.
F. L. DEBUSK, M. D.

UROLOGY
LEE SHARP, M. D.
A. L. MILLER, JR., M. D.

PSYCHIATRY-NEUROLOGY
W. M. C. WILHOIT, M. D.
F. L. CREEL, M. D.

RADIOLOGY
N. ARENSON, M. D.
A. T. HORNSBY, M. D.

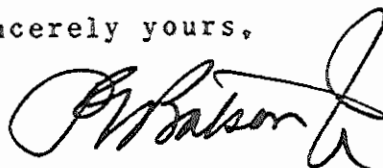
Mr. Thomas E. Lewis
Attorney at Law
204 Court of Record Building
Pensacola, Florida

Re: Clara Warren
411 East DeSoto St.
Pensacola, Florida

Dear Mr. Lewis:

I have been seeing Clara Warren since my last report to you of March 13, 1957. She has continued to have pain in the right side of the neck and right shoulder area. I think she does have some permanent disability in that she has recurrent myositis of the right trapezius muscle with some radiation of pain out into the right deltoid muscle. I am enclosing a copy of final bills on her.

Sincerely yours,



P. G. Batson, Jr., M. D.

PGB/i

3293

August 6, 1957

CLARA WARREN, Plaintiff

IN THE CIRCUIT COURT -LAW SIDE
BALDWIN COUNTY, ALABAMA

VS

WILLIS R. WOLFE, et al, Defendants

CASE NO. 3293

TO THE CIRCUIT COURT-LAW SIDE BALDWIN COUNTY, ALABAMA:

I, Mary Texas Hurt, Secretary of State, hereby certify that on July 24, 1957
I sent by registered mail in an envelope addressed as follows:

"

Willis R. Wolfe
Box 30
Marion, Virginia"

"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:

"

Willis R. Wolfe
Box 30
Marion, Virginia

You will take notice that on July 24, 1957 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: CLARA WARREN, Plaintiff VS WILLIS R. WOLFE, et al, Defendants

in the CIRCUIT COURT - LAW SIDE BALDWIN COUNTY, ALABAMA
Case No. 3293 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 24
day of July 1957

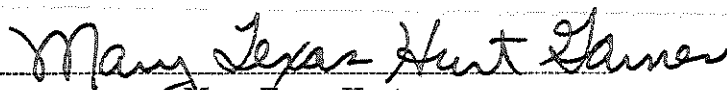
Enclosure (1)

(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 August 5, 1957 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Orlando, Fla.
on Aug 1 1957

WITNESS MY HAND and the Great Seal of the State of Alabama this the 6 day
of August 1957


Mary Texas Hurt
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable N. C. Stone, Jr.
Chason & Stone, Attorneys at Law
Arcade Building
Bay Minette, Alabama



STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert E. Eller and Willis R. Wolfe 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 Clara Warren.

Witness my hand this the 13 day of July, 1957.

Reing J. Smith
Clerk

CLARA WARREN,

Plaintiff,

VS.

ROBERT E. ELLER and WILLIS
R. WOLFE,

Defendants.

I
I
I
I
I
I
I

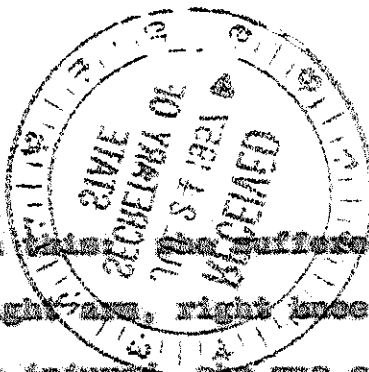
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Five Thousand Dollars (\$5,000.00) as damages for that on heretofore, to-wit: the 31st day of October, 1956, the Defendant Robert E. Eller, the servant, agent or employee of the Defendant Willis R. Wolfe, so negligently operated a motor vehicle at a point on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately two thousand feet (2,000) West of the Seminole fire tower, while acting within the line and scope of his employment as such agent, servant or employee, as to cause or allow said motor vehicle to run into, upon and against a motor vehicle in which the Plaintiff was riding as a passenger and as a proximate consequence and result of the negligence of the Defendant Robert E. Eller, aforesaid, while acting within the line and scope of his employment as agent, servant or employee of the Defendant Willis R. Wolfe, the Plaintiff was seriously and



Mr
W
M

permanently injured in this accident, she suffered multiple contusions and abrasions about her right arm, right knee and right shoulder area, her cervical spine was injured, she was caused to have recurrent myositis of the right trapezius muscle, she suffered and continues to suffer great pain and mental anguish, she has not been able to work since the date of said accident and has lost and will continue to lose time from her work, she was caused to incur and did incur medical, hospital and drug bills in and about the treatment and care of her said injuries and she was permanently disabled; wherefore the Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

By: Mahorne P. Stone, Jr.
Attorneys for Plaintiff

The Plaintiff demands a trial
by jury of this cause.

CHASON & STONE

By: Mahorne P. Stone, Jr.
Attorneys for Plaintiff

Mr
W
M

Defendants' addresses:

Robert R. Eller
Route 1
Marion, Virginia

Willis R. Wolfe
Box 30
Marion, Virginia

PRICE 17 DICK CLERK

FILED
JUL 1 1931
CLERK OF THE CIRCUIT COURT OF THE STATE OF VIRGINIA

July 30, 1957

CLARA WARREN, Plaintiff

IN THE CIRCUIT COURT - LAW SIDE
BALDWIN COUNTY, ALABAMA

VS

ROBERT R. ELLER, et al, Defendants

CASE NO. 3293

TO THE CIRCUIT COURT - LAW SIDE BALDWIN COUNTY, ALABAMA:

I, Mary Texas Hurt, Secretary of State, hereby certify that on July 24, 1957
I sent by registered mail in an envelope addressed as follows:

" Robert R. Eller
Route 1
Marion, Virginia"

"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:

" Robert R. Eller
Route 1
Marion, Virginia

You will take notice that on July 24, 1957 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: CLARA WARREN, Plaintiff VS ROBERT R. ELLER, et al, Defendants

in the CIRCUIT COURT - LAW SIDE BALDWIN COUNTY, ALABAMA
Case No. 3293 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 24
day of July 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 July 29, 1957 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Marion, Va.
on July 27, 1957

WITNESS MY HAND and the Great Seal of the State of Alabama this the 30 day
of July 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, Jr.
Chason & Stone, Attorneys at Law
Arcade Building
Bay Minette, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert R. Eller and Willis R. Wolfe 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 Clara Warren.

Witness my hand this the 23 day of July, 1957.

Deacy J. Leuck
Clerk

CLARA WARREN,

Plaintiff,

vs.

ROBERT R. ELLER and WILLIS
R. WOLFE,

Defendants.

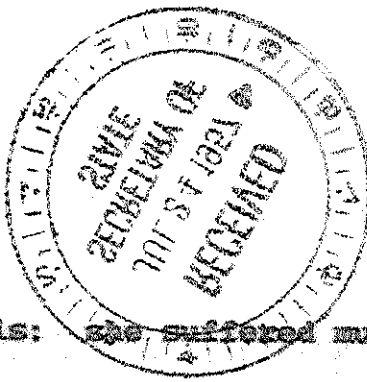
I
I
I
I
I
I
I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Five Thousand Dollars (\$5,000.00) as damages for that on heretofore, to-wit: the 31st day of October, 1956, the Defendant Robert R. Eller, the servant, agent or employee of the Defendant Willis R. Wolfe, so negligently operated a motor vehicle at a point on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately two thousand feet (2,000) West of the Seminole fire tower, while acting within the line and scope of his employment as such agent, servant or employee, as to cause or allow said motor vehicle to run into, upon and against a motor vehicle in which the Plaintiff was riding as a passenger and as a proximate consequence and result of the negligence of the Defendant Robert R. Eller, aforesaid, while acting within the line and scope of his employment as agent, servant or employee of the Defendant Willis R. Wolfe, the Plaintiff was seriously and



permanently injured in this: she suffered multiple contusions and abrasions about her right arm, right knee and right shoulder area, her cervical spine was injured, she was caused to have recurrent myositis of the right trapezius muscle, she suffered and continues to suffer great pain and mental anguish, she has not been able to work since the date of said accident and has lost and will continue to lose time from her work, she was caused to incur and did incur medical, hospital and drug bills in and about the treatment and care of her said injuries and she was permanently disabled; wherefore the Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

By: Marion Stone
Attorneys for Plaintiff

The Plaintiff demands a trial
by jury of this cause.

CHASON & STONE

By: Marion Stone
Attorneys for Plaintiff

Defendants' addresses:

Robert R. Eller
Route 1
Marion, Virginia

Willis R. Wolfe
Box 30
Marion, Virginia

RECEIVED

FILED

30
10
10

STATE OF ALABAMA

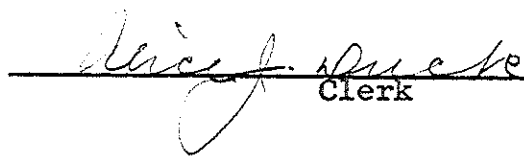
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert R. Eller and Willis R. Wolfe 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 Clara Warren.

Witness my hand this the 23 day of July, 1957.


Clerk

CLARA WARREN,

Plaintiff,

vs.

ROBERT R. ELLER and WILLIS
R. WOLFE,

Defendants.

1
1
1
1
1
1
1
1
1

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Five Thousand Dollars (\$5,000.00) as damages for that on heretofore, to-wit: the 31st day of October, 1956, the Defendant Robert R. Eller, the servant, agent or employee of the Defendant Willis R. Wolfe, so negligently operated a motor vehicle at a point on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately two thousand feet (2,000) West of the Seminole fire tower, while acting within the line and scope of his employment as such agent, servant or employee, as to cause or allow said motor vehicle to run into, upon and against a motor vehicle in which the Plaintiff was riding as a passenger and as a proximate consequence and result of the negligence of the Defendant Robert R. Eller, aforesaid, while acting within the line and scope of his employment as agent, servant or employee of the Defendant Willis R. Wolfe, the Plaintiff was seriously and

permanently injured in this: she suffered multiple contusions and abraisions about her right arm, right knee and right shoulder area, her cervical spine was injured, she was caused to have recurrent myositis of the right trapezius muscle, she suffered and continues to suffer great pain and mental anguish, she has not been able to work since the date of said accident and has lost and will continue to lose time from her work, she was caused to incur and did incur medical, hospital and drug bills in and about the treatment and care of her said injuries and she was permanently disabled; wherefore the Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

By: 
Attorneys for Plaintiff

The Plaintiff demands a trial
by jury of this cause.

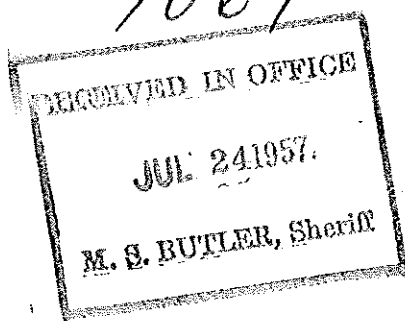
CHASON & STONE

By: 
Attorneys for Plaintiff

Defendants' addresses:

Robert R. Eller
Route 1
Marion, Virginia

Willis R. Wolfe
Box 30
Marion, Virginia



RECORDED

3293
CLARA WARREN,

Plaintiff,

vs.

ROBERT R. ELLER and WILLIS R.
WOLFE,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND BILL OF COMPLAINT

Executed by serving 6 copies of
the within on Mary Texas Hurt,
Secretary of State of The State of
Alabama.

(This the 24 day of July 1957)

Sheriff of Montgomery County
M. S. Butler,

By Goodwyn D. S.

The Sheriff claims 2
miles at 10c per mile for a total
of \$ 20.00

M S Butler, Sheriff
Montgomery County, Ala.

FILED

JUL 23 1957

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

CLARA WARREN,

Plaintiff,

VS.

ROBERT R. ELLER and WILLIS R.
WOLFE,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3293

DEMURRER

Now come the defendants, each separately and severally,
and for demurrer to the complaint assign, separately and severally,
the following:

1. It does not state a cause of action.
2. No facts are alleged on which the relief sought can
be granted.
3. The place where the alleged accident happened is not
described with sufficient certainty.

J. B. Blackburn
Attorney for defendants