

STATE OF ALABAMA)
BALDWIN COUNTY) . . . IN THE CIRCUIT COURT . . AT LAW . . .

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

3568

You are hereby commanded to summon Frank W. Lockwood, also sometimes known as Frank W. Lockwood III, to appear within thirty (30) 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 Frances Ruttencutter.

WITNESS my hand this the 11 day of June, 1958.

Robert R. Rucker
Clerk

Ed. 6-24-58

- COMPLAINT -

FRANCES RUTTENCUTTER,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA
-vs-)	
)	AT LAW
FRANK W. LOCKWOOD, also)	
known as FRANK W. LOCKWOOD, III,)	
)	
Defendant.)	

COUNT I

The Plaintiff claims of the Defendant Fifty Thousand Dollars (\$50,000.00), damages, for an assault and battery committed by the Defendant on the Plaintiff, viz., on the 29th day of January, 1958.

COUNT II

The Plaintiff claims of the Defendant Fifty Thousand Dollars (\$50,000.00), damages, for a willful and intentional assault and battery committed by the Defendant on the Plaintiff, viz., on the 29th day of January, 1958, in that the Defendant held the Plaintiff prisoner from, to-wit, 11:30 A. M., January 29, 1958, until, to-wit, 2:00 P. M., January 29, 1958, and while holding her as such prisoner, did assault and beat the Plaintiff, so much so that she was battered and bruised on and about her arms and body, and that her back was injured, and that as a proximate consequence

and result thereof, she has suffered much pain and anguish, has been confined in a hospital and has incurred considerable expenses for hospitalization and medical services, and for medicines and drugs in connection with the treatment of her injuries, that she was rendered permanently disabled, and, as a result and consequence of her said injuries has been rendered less able to earn an income, all as a result of the assault and battery committed on the person of the Plaintiff by the Defendant as aforesaid, wherefore Plaintiff sues.


Attorney for the Plaintiff


Plaintiff demands trial by Jury.

7/11/58
M. 3568

SUMMONS AND COMPLAINT

FRANCES RUTTENCUTTER,

Plaintiff,

-VS-

FRANK W. LOCKWOOD, also known
as FRANK W. LOCKWOOD III,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

(((((

FILED

JUN 11 1958

ALICE L. DICK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

Received 11 day of June 1958
and on 24 day of June 1958
I served a copy of the within S+C
on Frank W. Lockwood III
By service on _____

TAYLOR WILKINS, Sheriff
By Freddie Beach

Sherriff claims 106
Ten cents per mile Total \$ 10.60 miles at
BY Taylor Wilkins, Sheriff
Freddie Beach
DEPUTY SHERIFF

FRANCES RUTTENCUTTER,

Plaintiff,

-vs-

FRANK W. LOCKWOOD, also
known as FRANK W. LOCKWOOD,
III,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

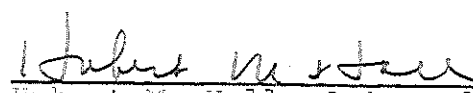
AT LAW

Comes the Plaintiff, by her attorney, and the death of Frank W. Lockwood, also known as Frank W. Lockwood, III, having been heretofore suggested, and the said Plaintiff now filing a motion to revive against his personal representative,

And it now being made known to the Court that Donald Firth Lockwood was appointed, as of the 12th day of November, 1958, as Executor of the estate of the said Frank W. Lockwood, the Defendant in this cause, it is therefore,

ORDERED, ADJUDGED AND DECREED by this Court that scire facias issue to the said Donald Firth Lockwood, as Executor of the estate of Frank W. Lockwood, also sometimes known as Frank W. Lockwood, III, Deceased.

DONE this the 21st day of July, 1959.


Hubert M. Hall, Judge of the Twenty-
eighth Judicial Circuit, Baldwin
County, Alabama

FILED

JUL 21 1959

AUGIE I. DUCK, CLERK
REGISTER

CECIL G. CHASON

ATTORNEY-AT-LAW

FOLEY, ALABAMA

June 10, 1958

Mrs. Alice J. Duck, Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Summons and Complaint in the suit of
Ruttencutter -vs- Lockwood.

Yours very truly,



C. G. Chason

CGC:fm

encls. as noted.

FRANCES RUTTENCUTTER,

Plaintiff,

vs.

FRANK W. LOCKWOOD, also
known as FRANK W. LOCKWOOD,
III,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Defendant in the above styled cause and demurs to "Count II" of the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said count does not state a cause of action.
2. That said count does not allege where the assault and battery was committed.
3. That said count does not sufficiently allege the facts in connection with the Defendant holding the Plaintiff as a prisoner.
4. That said count does not set out sufficient facts in connection with the alleged assault and battery.
5. That said count does not allege where the Plaintiff had been confined in a hospital and for what length of time.
6. That said count does not allege that the Plaintiff was employed at the time of her injury.

Filed
July 10, 1958
Alice J. Luck,
clerk.

Frances Stone
Attorneys for Defendant

3568
DEMURRER

* * * * *

FRANCES RUTTENCUTTER,

Plaintiff,

vs.

FRANK W. LOCKWOOD, also
known as FRANK W. LOCKWOOD, III,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

FILED

JUL 10 1958

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

AT LAW

sonal representative and Executor of the estate of Frank W. Lockwood, also known as Frank W. Lockwood, III, directing him to appear within thirty (30) days from the service of said Citation, to defend said cause.

Filed
7-21-59
Alice J. Duck
clerk


Attorney for Plaintiff

3568

Received 22 day of July 1954
and on 6 day of Aug 1954
served a copy of the within Petition
on Donald Firth Lockwood
by service on _____

TAYLOR WILKINS, Sheriff
By Archie D. Smith D. S.
Archie D. Smith

Sheriff claims 106 miles at
Ten Cents per mile Total \$ 10.60
TAYLOR WILKINS, Sheriff
BY CC
DEPUTY SHERIFF

PETITION TO REVIVE

FRANCES RUTTENCUTTER,
Plaintiff,

--VS--

FRANK W. LOCKWOOD, also
known as FRANK W. LOCKWOOD,
III,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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Filed
7-21-54
Cecil G. Chason
per

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

FRANCES RUTTENCUTTER,

Plaintiff,

-vs-

FRANK W. LOCKWOOD, also
known as FRANK W. LOCKWOOD,
III,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

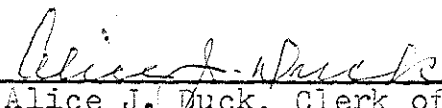
AT LAW

CITATION

TO DONALD FIRTH LOCKWOOD:

You are hereby commanded to be and appear, within thirty (30) days after date of service upon you, before the Circuit Court of Baldwin County, Alabama, and defend that certain cause, filed by Frances Ruttencutter, as Plaintiff, against Frank W. Lockwood, also known as Frank W. Lockwood, III, as Defendant, for personal injury through an assault and battery committed on her person on, to-wit, the 29th day of January, 1958, in the place and stead of the said Frank W. Lockwood, also known as Frank W. Lockwood, III, now deceased, as Defendant.

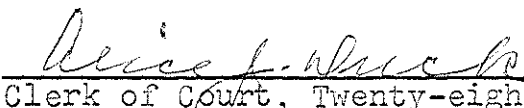
WITNESS my hand this the 21 day of July, 1959.


Alice J. Duck, Clerk of Court

TO ANY SHERIFF OF THE STATE OF ALABAMA; Greetings:-

You are hereby commanded to execute the foregoing and due return thereof make according to law.

WITNESS my hand this the 21 day of July, 1959.


Clerk of Court, Twenty-eighth Judicial
Circuit, Baldwin County, Alabama