

JERRY EDDINS
PLAINTIFF

VS.

LAWRENCE BELLOS, alias,
LARRY BELLOS
DEFENDANT

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)

IN LAW

NO. 3672

COUNT ONE

Plaintiff claims of the defendant the sum of \$17,653.00, as damages, for that plaintiff avers that on, to-wit: October 8, 1957, plaintiff was riding a bicycle on a public street, viz: West Laurel Avenue, in Foley, Baldwin County, Alabama at or near the intersection of West Laurel Avenue and Oak Street in said city and on to-wit: said day and date, the Defendant negligently ran an automobile or automotive vehicle into, upon or against the plaintiff and his bicycle, and as the proximate result and consequence thereof, plaintiff's bicycle was damaged and demolished and plaintiff was severely injured to his person to-wit: his body was severely wrenched, sprained bruised, his limbs and body was lacerated, skinned and bruised, his right leg was broken and fractured in two or more places, he was caused to suffer great physical and mental pain and anguish, and his nervous system was greatly impaired and shocked, and was permanently impaired and shocked, he was caused to incur considerable expense for medical treatment, hospital services, nurses' hire, and the purchase of medicines and drugs in and about the treatment of his said injuries, he was caused to lose many months work and his working and earning ability was greatly and permanently impaired, for all of which he claims damages in the sum aforesaid.

COUNT TWO

Plaintiff claims of the defendant the sum of \$17,653.00, as damages, for that plaintiff avers that on, to-wit: October 8, 1957, plaintiff was riding a bicycle on a public street, viz: West Laurel Avenue, in Foley, Baldwin County, Alabama, at or near the intersection of West Laurel Avenue and Oak Street in said city and on to-wit: said day and date, the agent, servant, or employee of the defendant, while acting within the line and scope of his employment negligently ran an automobile belonging to the defendant, into, upon or against the plaintiff and his bicycle, and as the proximate result and consequence thereof, plaintiff's bicycle was damaged and demolished and plaintiff was severely injured to his person to-wit: his body was severely wrenched, sprained and bruised, his right leg was broken, and fractured in two or more places, his limbs and body were lacerated, skinned and bruised, he was caused to suffer great physical and mental pain and anguish, and his nervous system was greatly impaired and shocked and was permanently impaired and shocked, he was caused to incur considerable expense for medical treatment, hospital services, nurses' hire, and the purchase of medicines and drugs in and about the treatment of his said injuries, he was caused to lose many months' work and his working and earning ability was greatly and permanently impaired, for all of which he claims damages in the sum aforesaid.

THE PLAINTIFF DEMANDS
A TRIAL BY JURY

Arthur L. Spencer
Attorney for the Plaintiff

Arthur L. Spencer
Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Prtg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 3672

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LAWRENCE BELLOS, alias LARRY BELLOS

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

LAWRENCE BELLOS, alias LARRY BELLOS, Defendant

by JERRY EDDINS

....., Plaintiff

Witness my hand this 7th day of October 1958

....., Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3672

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LAWRENCE BELLOS, alias LARRY BELLOS

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

LAWRENCE BELLOS, alias LARRY BELLOS, Defendant

by JERRY EDDINS, Plaintiff

Witness my hand this 7th day of October 1958

, Clerk

JERRY EDDINS
PLAINTIFF

VS.

LAWRENCE BELLOS, alias,
LARRY BELLOS
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN LAW

NO. _____

COUNT ONE

Plaintiff claims of the defendant the sum of \$17,653.00, as damages, for that plaintiff avers that on, to-wit: October 8, 1957, plaintiff was riding a bicycle on a public street, viz: West Laurel Avenue, in Foley, Baldwin County, Alabama at or near the intersection of West Laurel Avenue and Oak Street in said city and on to-wit: said day and date, the Defendant negligently ran an automobile or automotive vehicle into, upon or against the plaintiff and his bicycle, and as the proximate result and consequence thereof, plaintiff's bicycle was damaged and demolished and plaintiff was severely injured to his person to-wit: his body was severely wrenched, sprained bruised, his limbs and body was lacerated, skinned and bruised, his right leg was broken and fractured in two or more places, he was caused to suffer great physical and mental pain and anguish, and his nervous system was greatly impaired and shocked, and was permanently impaired and shocked, he was caused to incur considerable expense for medical treatment, hospital services, nurses' hire, and the purchase of medicines and drugs in and about the treatment of his said injuries, he was caused to lose many months' work and his working and earning ability was greatly and permanently impaired, for all of which he claims damages in the sum aforesaid.

COUNT TWO

Plaintiff claims of the defendant the sum of \$17,653.00, as damages, for that plaintiff avers that on, to-wit: October 8, 1957, plaintiff was riding a bicycle on a public street, viz: West Laurel Avenue, in Foley, Baldwin County, Alabama, at or near the intersection of West Laurel Avenue and Oak Street in said city and on to-wit: said day and date, the agent, servant, or employee of the defendant, while acting within the line and scope of his employment negligently ran an automobile belonging to the defendant, into, upon or against the plaintiff and his bicycle, and as the proximate result and consequence thereof, plaintiff's bicycle was damaged and demolished and plaintiff was severely injured to his person to-wit: his body was severely wrenched, sprained and bruised, his right leg was broken, and fractured in two or more places, his limbs and body were lacerated, skinned and bruised, he was caused to suffer great physical and mental pain and anguish, and his nervous system was greatly impaired and shocked and was permanently impaired and shocked, he was caused to incur considerable expense for medical treatment, hospital services, nurses' hire, and the purchase of medicines and drugs in and about the treatment of his said injuries, he was caused to lose many months' work and his working and earning ability was greatly and permanently impaired, for all of which he claims damages in the sum aforesaid.

THE PLAINTIFF DEMANDS
A TRIAL BY JURY

Attorney for the Plaintiff

Attorney for the Plaintiff