

3786

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA,  
GREETING:

You are hereby commanded to summons Thomas E. Comish to appear within thirty (30) days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held for said county at the place of holding same, then and there to answer, plead or demur to the complaint of Mrs Eunice Bethea.

Witness my hand, this 9 day of March, 1959.

*Alice G. Duck*  
CLERK

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C O M P L A I N T

MRS EUNICE BETHEA,  
  
PLAINTIFF.  
VS.  
  
THOMAS E. COMISH,  
  
DEFENDANT.

IN THE CIRCUIT COURT OF  
  
BALDWIN COUNTY, ALABAMA.  
  
LAW SIDE.  
  
NUMBER: 3786

The plaintiff claims of the defendant the sum of Thirty Thousand and No/100 (\$30,000.00) Dollars damages for this; that heretofore and on to-wit; Sunday, September 21, 1958 the plaintiff was driving an automobile over and along U. S. Highway Number 31, a public highway, when at a point on said public highway in Baldwin County, Alabama approximately six (6) miles South of Perdido, Alabama where plaintiff had a right to drive an automobile the defendant negligently drove an automobile traveling in the opposite direction from that being then and there traveled by plaintiff South into, over, upon or against the automobile being then and there driven North by Plaintiff and as a proximate consequence of the negligence of the defendant plaintiff was severely injured in this, to-wit:

Plaintiff suffered a severe laceration of the left upper arm with severe and permanent radial nerve damage; plaintiff suffered a drop wrist; plaintiff suffered a fracture of the left patella (knee cap); plaintiff suffered a severe contusion of the right ankle; plaintiff suffered a severe sprain of the right ankle; plaintiff suffered contusions of the right chest; plaintiff suffered laceration of the right lower leg; plaintiff was permanently injured; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was put to much trouble, annoyance, inconvenience

and loss of time in and about an effort to heal and cure her said wounds; plaintiff was caused to incur and did incur large doctor, hospital and medical bills; plaintiff was caused to lose much time from her work; plaintiff was caused much mental anguish and physical pain for all of which plaintiff now claims damages as aforesaid.

COUNT TWO.

The plaintiff claims of the defendant the sum of Thirty Thousand and No/100 (\$30,000.00) Dollars damages for this; that heretofore and on to-wit; Sunday, September 21, 1958 the plaintiff was driving an automobile North over and along U. S. Highway Number 31, a public highway, when at a point on said public highway in Baldwin County, Alabama the defendant drove an automobile then and there traveling South into, over, upon or against the automobile being then and there operated by plaintiff and as a proximate consequence thereof plaintiff was severely injured and damaged in this;

Plaintiff suffered a severe laceration of the left upper arm with severe and permanent radial nerve damage; plaintiff suffered a drop wrist; plaintiff suffered a fracture of the left patella (knee cap); plaintiff suffered a severe contusion of the right ankle; plaintiff suffered a severe sprain of the right ankle; plaintiff suffered contusions of the right chest; plaintiff suffered lacerations of the right lower leg; plaintiff was permanently injured; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds; Plaintiff was caused to incur and did incur large doctor, hospital and medical bills; plaintiff was caused to lose much time from her work; plaintiff was caused to suffer much mental anguish and physical pain for all of which plaintiff claims damages as aforesaid.

And plaintiff avers that the defendant at said time and place wantonly injured plaintiff by wantonly running a motor vehicle over, upon or against the automobile being then and there driven by plaintiff and as a proximate consequence of said wanton conduct on the part of defendant plaintiff avers that she was caused to sustain and did sustain the injuries and damages complained of and set out herein.

KORNE, WEBB & TUCKER

BY:

*W. Korne & Webb.*

ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved  
in this cause.

HORNE, WEBB & TUCKER

BY:

*W. Taylor Webb*

ATTORNEYS FOR PLAINTIFF.

3786 116  
#109

Mar Eunice Bethea  
Plaintiff

vs

Thomas E. Cornish  
1567 Edgemoor St  
dependant

Wks -  
Alabama State  
Docks

not Employed by  
Alabama State Docks

FILED  
MAR 9 1959  
ALICE L. HORN, CLERK  
REGISTERED

went to England  
W F

Law Offices of  
Horne & Webb  
Attorneys at Law  
Atmore, Ala.

B

TO ANY SHERIFF OF THE STATE OF ALABAMA,  
GREETING:

Witness my hand, this 9 day of March, 1959.

Oliver J. Luck  
CLERY

N.F.

\* \* \* \* \*

C O M P L A I N T

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

NUMBER: 3786

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and loss of time in and about an effort to heal and cure her said wounds; plaintiff was caused to incur and did incur large doctor, hospital and medical bills; plaintiff was caused to lose much time from her work; plaintiff was caused much mental anguish and physical pain for all of which plaintiff now claims damages as aforesaid.

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Plaintiff suffered a severe laceration of the left upper arm with severe and permanent radial nerve damage; plaintiff suffered a drop wrist; plaintiff suffered a fracture of the left patella (knee cap); plaintiff suffered a severe contusion of the right ankle; plaintiff suffered a severe sprain of the right ankle; plaintiff suffered contusions of the right chest; plaintiff suffered lacerations of the right lower leg; plaintiff was permanently injured; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds; Plaintiff was caused to incur and did incur large doctor, hospital and medical bills; plaintiff was caused to lose much time from her work; plaintiff was caused to suffer much mental anguish and physical pain for all of which plaintiff claims damages as aforesaid.

And plaintiff avers that the defendant at said time and place wantonly injured plaintiff by wantonly running a motor vehicle over, upon or against the automobile being then and there driven by plaintiff and as a proximate consequence of said wanton conduct on the part of defendant plaintiff avers that she was caused to sustain and did sustain the injuries and damages complained of and set out herein.

HORNE, WEBB & TUCKER

BY:

*W. E. Webb*  
ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved  
in this cause.

HORNE, WEBB & TUCKER

BY:

*W. Webb & Tucker*

ATTORNEYS FOR PLAINTIFF.

Received 9 day of mar 1959  
and on day of 19

I served a copy of the within dec  
on Thomas E. Cornish

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_ D. S.

RETURNED 3-13-59  
Not found in my County after diligent  
search and inquiry.

RAY D. BRIDGES, Sheriff

By P. B. Binsworth D. S.

RETURNED 3-6-59  
Not found in my County after diligent  
search and inquiry.

RAY D. BRIDGES, Sheriff

By B. Harris D. S.

~~1440~~ 3786 1/6  
cd 1506  
H. B. B.

Mrs. Eunice Bethea  
Plaintiff

vs  
NF  
Thomas E. Cornish  
Defendant

FILED

MAR 9 1959

AUGIE L. DICK, CLERK  
REGISTER

Law Offices of  
Horne & Webb  
Attorneys at Law  
Atmore, Ala.