

STATE OF ALABAMA,
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MARY DONNA LINTON AND MARY ETHELINE LINTON 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 the same, then and there to answer the complaint of LEONARD J. BLAIR.

WITNESS my hand this the 5 day of August, 1959.

W. J. Blair

C O M P L A I N T

LEONARD J. BLAIR,

Plaintiff,

VS.

MARY DONNA LINTON AND
MARY ETHELINE LINTON,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO.

3928

C O U N T O N E

The plaintiff claims of the defendants the sum of SEVEN THOUSAND FIVE HUNDRED AND NO/100ths (\$7,500.00) DOLLARS as damages, for that heretofore, on, to-wit: the 2nd day of July, 1959, at about 9:30 A. M., at the intersection of Alabama Highway Number 59 and U. S. Highway Number 98, public highways, in the City of Foley, Baldwin County, Alabama, the defendant, MARY DONNA LINTON, who was then and there an agent, servant, or employee of the defendant, MARY ETHELINE LINTON, Acting within the line and scope of her employment as such, so negligently operated an automobile belonging to the said MARY ETHELINE LINTON, which the said MARY DONNA LINTON was then and there driving, as to cause, allow, or permit, the same to run into, upon or against an automobile in which the plaintiff was a passenger, which said automobile was stopped for a red traffic light, at the intersection above described, and as a proximate consequence and result thereof plaintiff received severe personal injuries in this, to-wit: he was caused to suffer whiplash injuries to his neck and spine; he was internally injured; he was permanently injured; he was caused to suffer internal hemorrhages; he had just recently been operated and the operation incision was torn loose; he was caused to suffer much physical and mental pain; his conve-

lescence was delayed; he suffered bruises and contusions about his face and head; he was made sick, sore, lame and disordered; he was caused to expend large sums for doctors, hospital bills and medicines in caring for his said injuries; for all of which he claims damages as aforesaid, hence this suit.

J. H. A. Maslowski
ATTORNEY FOR PLAINTIFF

6 Plaintiff demands that this cause be tried by a jury.

J. H. A. Maslowski
ATTORNEY FOR PLAINTIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 3928

LEONARD J. BLAIR,
Plaintiff,

VS.

MARY DONNA LINTON AND
MARY ETHELINE LINTON,
Defendants.

SUMMONS AND COMPLAINT.

FILED

AUG 5 1959

CLERK
TELMAR J. MASHBURN, JR.
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

Defendants live at Foley, Ala.

Received 5 day of Aug 1959
and on 6 day of Aug 1959
served a copy of the within
on Mary Etheline Linton
Mary Donna Linton
By service on _____

TAYLOR WILKINS, Sheriff
By Loarville News S.

Foley

Sheriff claims 14 1/4 miles at
Ten Cents per mile Total \$ 14 40
TAYLOR WILKINS, Sheriff
BY CC DEPUTY SHERIFF

LEONARD J. BLAIR,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
MARY DONNA LINTON and	X	
MARY ETHELINE LINTON,	X	AT LAW
Defendants.	X	

Come the Defendants in the above styled cause and for plea to the complaint filed in said cause, say\$:

1. Not guilty.
2. That the allegations of the complaint are untrue.

FILED

DEC 3 1959

ALICE J. DUCK, Clerk


Attorneys for Defendants

3928

LEONARD J. BLAIR,

Plaintiff,

vs.

MARY DONNA LINTON ET AL.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

PLEAS

FILED
DEC 3 1959
ALICE J. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

3928

LEONARD J. BLAIR,

Plaintiff,

vs.

MARY DONNA LINTON ET AL.,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

PLEAS

FILED

DEC 3 1959

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

LEONARD J. BLAIR,

Plaintiff,

VS.

MARY DONNA LINTON AND
MARY ETHELINE LINTON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____

AMENDED COMPLAINT

Comes the plaintiff in the above styled cause and amends his complaint heretofore filed in said cause by adding thereto "COUNT B", as follows:

C O U N T B

The plaintiff claims of the defendants the sum of TWENTY FIVE THOUSAND (\$25,000.00) DOLLARS as damages, for that, heretofore, on, to-wit: the 2nd day of July, 1959, at about 9:30 o'clock, A. M., at the intersection of Alabama Highway Number 59 and U. S. Highway Number 98, public highways, in the City of Foley, Baldwin County, Alabama, the defendant, MARY DONNA LINTON, who was then and there an agent, servant or employee of the defendant, MARY ETHELINE LINTON, acting within the line and scope of her employment as such, so negligently operated an automobile belonging to the said MARY ETHELINE LINTON, which the said MARY DONNA LINTON was then and there driving, as to cause, allow or permit the same to run into, upon or against the rear of a boat and boat carrier, which boat and boat carrier was attached to the rear of, and being towed by, an automobile in which plaintiff was a passenger, which said automobile, boat and boat carrier was stopped for a red traffic light at the intersection above described; and plaintiff avers that the boat was driven into the rear of the automobile in which he was riding as a passenger and as a proximate result and consequence thereof plaintiff received severe personal injuries in this, to-wit: he was caused to suffer whiplash injuries to his neck and spine; he was internally injured; he was permanently injured; he was caused to suffer internal hemorrhages; he had recently had an operation and the operation incision was torn loose; he was caused to suffer much physical and mental pain; he suffered bruises and contusions about his face and head; he was made sick, sore, lame and disordered; he was rendered unable to do the work he was doing before his said injuries and was forced to resign from his job as a machinist at the Naval Air Station, Pensacola, Florida, where he

was making a wage of \$2.87 per hour, and that he has been unable to obtain work that he is able to do that will pay the same wage scale; that he was caused to expend large sums of money for doctors, hospital bills and medicines in caring for his said injuries; for all of which plaintiff claims damages as aforesaid, hence this suit.

Filed
2-22-60

J. J. M. M. M. M. M.
ATTORNEY FOR PLAINTIFF.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 3928

LENOARD J. BLAIR,

PLAINTIFF,

VS.

MARY DONNA LINTON AND
MARY ETHELINE LINTON,

Defendants.

AMENDMENT TO COMPLAINT.

FILED

FEB 22 1960

ALICE J. DUCK, CLERK
REGISTER