

HAZEL LYNCH : IN THE CIRCUIT COURT OF
Plaintiff : BALDWIN COUNTY
VS: : ALABAMA
ROBERT JAYE : AT LAW
Defendant : CASE NO. 4029

COUNT ONE

Plaintiff claims of the defendant the sum of TWENTY FIVE THOUSAND AND 00/100 (\$25,000.00) DOLLARS, for this, that heretofore and on, to-wit, the 10th day of November, 1958, the plaintiff was operating an automobile on or along U. S. Highway 31 approximately three miles East of Spanish Fort, said U. S. Highway 31 being then and there a public highway in Baldwin County, Alabama, and at the time and place aforesaid the defendant did so negligently operate a motor truck so as to cause or allow the same to run into and against the automobile which the plaintiff was then and there operating and as a direct and proximate consequence of the aforesaid negligence of the defendant the plaintiff was greatly injured in that she was made sick, lame and sore, was caused to have a tooth broken from her mouth, suffered multiple abrasions about her body and being pregnant at the time was caused to suffer a great deal of mental anguish over the condition of her unborn child, and has suffered severe and permanent injuries in that she was caused to have a vaginal prolapse, all to her damage in the amount aforesaid, hence this suit.

COLLINS, GALLOWAY & MURPHY

BY: [Signature]
Attorneys for Plaintiff

Plaintiff respectfully demands a trial by Jury of this cause.

COLLINS, GALLOWAY & MURPHY

BY: [Signature]
Attorneys for Plaintiff

Address of Defendant:
Atmore, Alabama

FILED

OCT 28 1959

118

ALICE J. BARK, Clerk

SUMMONS AND COMPLAINT

Circuit Court, Baldwin County

The State of Alabama,
Baldwin County.

No. 4029

TERM, 19--

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ROBERT JAYE

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

ROBERT JAYE

Defendant--

HAZEL LYNCH

Plaintiff--

Witness my hand this 28 day of October 1959

Alvin J. Duck, Clerk

Ed. 10-30-59

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW
817 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA
HEMLOCK 2-0568

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1925-1936)
WILLIAM H. McDERMOTT

October 27, 1959

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

Re: Hazel Lynch v. Robert Jaye
and
Roy Lynch v. Robert Jaye

Dear Mrs. Duck:

Enclosed please find two complaints to be filed
in the Circuit Court of Baldwin County.

I will appreciate your filing these for us and
advising me of same.

Very truly yours,

Collins, Galloway & Murphy

By: Thomas M. Galloway
Thomas M. Galloway *mlg*

TMG:mlg
Encl: 2 complaints.

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW
817 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA
HEMLOCK 2-0568

FRED G. COLLINS
THOMAS M. GALLOWAY
M. THOMAS MURPHY (1925-1956)
WILLIAM H. McDERMOTT

November 5, 1959

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

Re: Hazel Lynch v. Robert Jaye and
Jerald Lee Jaye, separately and
severally;

Roy Lynch v. Robert Jaye and
Jerald Lee Jaye, separately and
severally.

(2 cases)

Dear Mrs. Duck:

I enclose herewith two suits to be filed in the
Circuit Court of Baldwin County, Alabama. I have
previously filed two suits, and if the enclosed are
filed not later than November the 9th, 1959 in your
Court would you please ask the Judge to dismiss the
previous two suits filed at my request. You will
notice that in the previous suits I sued only Robert
Jaye but in these suits I have sued both Robert Jaye
and Jerald Lee Jaye. The time for filing must be by
November the 9th so please advise the date upon which
the enclosed suits are filed.

Very truly yours,

Collins, Galloway & Murphy

By:


Thomas M. Galloway

*Filed
11-6-59*

TMG:mlg
Encl: 2 suits

new
cases

4042
4043

6204