

INA M. HAWKINS	)
FLA INTIFF	IN THE CIRCUIT COURT OF
∇S	BALDWIN COUNTY, ALABAMA,
K. P. SAWYER	AT LAW
DEFENDANT	No. 4102

Comes now the Defendant in the above styled cause and demurs to the Flaintiff's complaint and for grounds therefor says:

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The Complaint does not show where the accident complained of occurred.

Wilters & Brantley

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Attorneys for the Defendant

INA M. HAWKINS

PLAINT IFF

VS

K. P. SAWYER

DEFENDANT

DEMURRERS



## AMENDED COMPLAINT

INA M. HAWKINS.

Plaintiff,

VS.

K. P. SAWYER,

Defendant.

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

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

## COUNT "A"

The plaintiff claims of the defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that, heretofore, on, to-wit: the 16th day of October, 1959, at about 1:30 o'clock, P. M., at the intersection of U. S. Highway Number 31 and Hoyle Avenue, in the City of Bay Minette, Baldwin County, Alabama, a public highway in said County and State, plaintiff's car was stopped for a red traffic light, and the defendant so negligently operated a motor vehicle which he was then and there driving as to cause, permit or allow said motor vehicle to run into, upon or against the rear of plaintiff's automobile, and as a proximate consequence and result thereof plaintiff received severe personal injuries in this, to-wit: she suffered whiplash injuries to her neck and spine; she was internally injured; she was permanently injured; she was caused to suffer much physical and mental pain; she was made sick, sore, lame and disordered; she was caused to expend large sums of money for doctors, hospital bills and medicines for treatment of her said injuries; and plaintiff avers that all of her said injuries were the proximate result and consequence of the defendant's negligence as aforesaid; for all of which she claims damages as aforesaid; hence this suit.

Filsd 1-27-68 ATTORNEY FOR PLAINTIFF.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 4107

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INA M. HAWKINS,

Plaintiff,

VS.

K. P. SAWYER,

Defendant.

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AMENDED COMPLAINT.



STATE OF ALABAMA,
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon K. P. SAWYER, of Route 1, Monroeville, Alabama, 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 INA M. HAWKINS.

WITNESS my hand this the // day of December, 1959.

CLERK/ . which

Ex-12-16-59

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## COMPLAINT

INA M. HAWKINS,

Plaintiff,

VS.

K. P. SAWYER,

Defendant.

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

## COUNT ONE

The plaintiff claims of the defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages, for that, heretofore, on, to-wit: the 16th day of October, 1959, at about 1:30 o'clock, P. M., one U. S. Highway Number 31, a public highway in Baldwin County, Alabama, plaintiff's car was stopped for a red traffic light, one block from the courthouse in Bay Minette, Alabama, and the defendant so negligently operated motor vehicle which he was then and there driving as to cause, permit or allow said vehicle to run into, upon or against plaintiff's said automobile, and as proximate result and consequence thereof plaintiff received severe personal injuries in this, to-wit: she suffered whiplash injuries to her neck and spine; she was internally injured; she was permanently injured; her shoulders were sprained; she was caused to suffer much physical and mental pain; she was made sick, sore, lame and disordered; she was caused to expend large sums of money for doctors, hospital bills and medicines for treatment of her said injuries; and plaintiff avers that all of her said injuries were the proximate result and consequence of the defendant's negligence as aforesaid; for all of which she claims

damages as aforesaid; hence this suit.

ATTORNEY FOR PLAINTIFF

Plaintiff demands that this cause be tried by a jury.

ATTORNEY FOR PLAINTIFF

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. NO. 4102 AT LAW.

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INA M. HAWKINS,

Plaintiff,

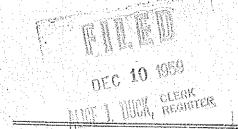
VS.

K. P. SAWYER,

Defendant.

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SUMMONS AND COMPLAINT



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

DEFENDANT RESIDES ON: RFD Number 1,

Charlie Sizemore, Sheriff!
Monroe County, Alabama!

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