

4102

INA M. HAWKINS

PLAINTIFF

VS

K. P. SAWYER

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 4102

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

1.

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

Wilters & Brantley

BY: Robert M. Brantley
Attorneys for the Defendant

Filed
1-7-60

INA M. HAWKINS

PLAINTIFF

VS

K. P. SAWYER

DEFENDANT

DEMURRERS

FILED

JAN 17 1960

ALICE J. DICK, CLERK
REGISTER

A M E N D E D C O M P L A I N T

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:

C O U N T "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.

Filed
1-27-60

J. H. A. Madison
ATTORNEY FOR PLAINTIFF.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 4102

INA M. HAWKINS,

Plaintiff,

VS.

K. P. SAWYER,

Defendant.

AMENDED COMPLAINT.

FILED

JAN 27 1960

ALICE L. DUCK, CLERK
REGISTER

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 11 day of December, 1959.

C L E R K

EX-12-16-59

C O M P L A I N T

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

VS.

AT LAW. NO.

K. P. SAWYER,
Defendant.

C O U N T O N E

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.

Julius A. Marble
ATTORNEY FOR PLAINTIFF

Plaintiff demands that this cause be tried by a jury.

Julius A. Marble
ATTORNEY FOR PLAINTIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 4102

INA M. HAWKINS,
Plaintiff,

VS.

K. P. SAWYER,
Defendant.

SUMMONS AND COMPLAINT

FILED
DEC 10 1959
MURPHY J. DUCK, CLERK
REGISTER

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

DEFENDANT RESIDES ON:
RFD Number 1,

The Sheriff Claims
Miles at 100 per mile
For a total of \$ 240
Charlie Sizemore, Sheriff
Monroe County, Alabama

EXECUTED BY SERVING A COPY OF THE
WITHIN SUMMONS AND COMPLAINT
THIS 16 DAY OF May 1959
Charlie Sizemore
SHERIFF MONROE COUNTY, ALA.
Walter + Son