

ELLEN V. ROMEO,) IN THE CIRCUIT COURT OF
PLAINTIFF,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
WILLIAM M. WARD,)
DEFENDANT.)

4140

WITHDRAWAL OF DEMAND FOR TRIAL BY JURY

Comes the Plaintiff by her attorney and withdraws her demand for trial by jury previously filed in this matter.

James A. Quinn
ATTORNEY FOR PLAINTIFF

FILED
FEB 25 1980
J. L. DUCK, CLERK
REGISTER

135

ELLEN V. ROMEO,)	IN THE CIRCUIT COURT OF
)	
PLAINTIFF,)	BALDWIN COUNTY, ALABAMA
VS.)	
WILLIAM M. WARD,)	AT LAW.
)	
DEFENDANT.)	

C O M P L A I N T

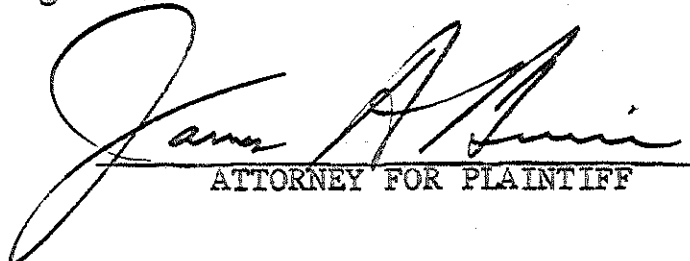
I.

The plaintiff claims of the defendant the sum of Fifteen Thousand and No/100 (\$15,000.00) Dollars, as damages, for that heretofore on, to-wit: the 25th day of October, 1959, the plaintiff was riding in a vehicle being operated Southwardly on a public highway, viz: Baldwin County Highway No. 11 at a point in Baldwin County, Alabama 5.7 miles South of the corporate limits of Fairhope, Alabama, by Ernest F. Romeo, where she and said vehicle had a right to be, and the defendant, William M. Ward, so negligently operated a motor vehicle then and there as to cause said motor vehicle he was operating to run upon and against the automobile the plaintiff was riding in; and plaintiff avers that as a proximate consequence thereof, the plaintiff was seriously and permanently injured, was made sick and sore, was caused to suffer great physical pain and anguish; the plaintiff received a head concussion, scalp lacerations, chest injuries, contusions, and abraisions in and about her legs, face, and body. The plaintiff has suffered and will continue to suffer permanent disability and permanent scars due to the aforesaid injuries sustained in this accident, and the plaintiff was caused to incur expenses of doctors, nurses, x-rays, ambulances, hospital and drugs in and about her said injuries as aforesaid and will likely incur additional expenses of like nature in the future, for all of which she claims damages as aforesaid.

II.

The plaintiff claims of the defendant the sum of Fifteen Thousand and No/100 (\$15,000.00) Dollars, as damages, for that heretofore on, to-wit: the 25th day of October, 1959, the plaintiff was riding in a vehicle being operated Southwardly on a public

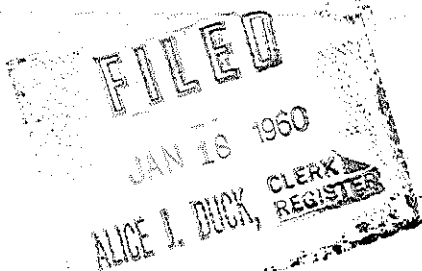
highway, viz: Baldwin County Highway No. 11 at a point in Baldwin County, Alabama 5.7 miles South of the corporate limits of Fairhope, Alabama, by Ernest F. Romeo, where she and said vehicle had a right to be, and the defendant, William M. Ward, so wantonly operated a motor vehicle then and there as to cause said motor vehicle he was operating to run upon and against the automobile the plaintiff was riding in; and plaintiff avers that as a proximate consequence thereof, the plaintiff was seriously and permanently injured, was made sick and sore, was caused to suffer great physical pain and anguish; the plaintiff received a head concussion, scalp lacerations, chest injuries, contusions, and abraisions in and about her legs, face and body. The plaintiff has suffered and will continue to suffer permanent disability and permanent scars due to the aforesaid injuries sustained in this accident, and the plaintiff was caused to incur expenses of doctors, nurses, x-rays, ambulances, hospital, and drugs in and about her said injuries as aforesaid and will likely incur additional expenses of like nature in the future; for all of which she claims damages as aforesaid.


ATTORNEY FOR PLAINTIFF

DEMAND FOR TRIAL BY JURY:

Plaintiff demands trial by Jury.


ATTORNEY FOR PLAINTIFF



SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon WILLIAM M. WARD

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 WILLIAM M. WARD

-----, Defendant.-----

by ELLEN V. ROMEO

-----, Plaintiff.-----

Witness my hand this 18 day of JANUARY 1960

EX 1-19-60 Dee-f-nur, Clerk

No. 44148

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ELLEN V. ROMEO

Plaintiffs

vs.

WILLIAM M. WARD

Defendants

Summons and Complaint

Filed

FILED

19

JAN 18 1960

Clerk

AUGIE J. DUCK, REGISTER
CLERK

JAMES A. BRICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

At 1, Fairhope

Received In Office

, 19

Sheriff.

I have executed this summons

this 1-19-1960

by leaving a copy with

William M. Ward

Sheriff claims 100 miles at

Ten Cents per mile Total \$10.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Edleigh Ward

Deputy Sheriff.

Barnette, also