

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William Gordan Smith and Sears, Roebuck and Company, a Corporation, 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 Noma E. Rider.

WITNESS my hand, this 27 day of October, 1960.

Walter J. Duck
Clerk

NOMA E. RIDER,

Plaintiff,

VS.

WILLIAM GORDAN SMITH and
SEARS, ROEBUCK AND COMPANY,
A Corporation,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

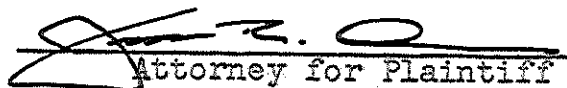
4469

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendants TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) for that heretofore on to-wit, July 28, 1960, the Defendant, William Gordan Smith, so negligently operated an automobile truck along and upon County Highway No 86 in Baldwin County, Alabama, at a point 500 feet East of the Bay Minette Creek Bridge as to cause the said automobile truck to run into, upon or against an automobile which the Plaintiff was driving and where she had a right to be, and as a proximate result and consequence of the negligence of the said William Gordan Smith, who was at said time and place an agent, servant or employee of the Defendant, Sears, Roebuck and Company, a Corporation, acting within

the line and scope of his authority as such agent, servant or employee, the Plaintiff was injured and damaged as follows: She was caused to be unconscious for approximately eighteen hours; she suffered multiple facial lacerations; she suffered a brain concussion; her spleen was ruptured and she was forced to undergo surgery to remove her spleen; she suffered a sprained left ankle; she suffered multiple abrasions and contusions; she was confined to a hospital for treatment for approximately three weeks; she was made sick, sore and nervous; she was injured and permanently injured and was forced to spend much time and money in and about medical, hospital and doctor treatment; and plaintiff avers that all of her injuries and damages were caused as a proximate consequence of the negligence of the Defendant, William Gordan Smith, an agent, servant or employee of the Defendant, Sears, Roebuck and Company, a Corporation, while acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by jury of said cause.


Attorney for Plaintiff

July of said cause.
Plaintiff demands a trial by

~~Attorney for Plaintiff~~
S. S. O.

~~Attorney for Plaintiff~~
S. S. O.

3-3-

paid⁰⁰ William
Gordon Smith
Rear.

Route 1 Box 456 A
Saraland

his authority as such agent, servant or employee, hence this said
company, a corporation, while acting within the line and scope of
an agent, servant or employee of the Defendant, George Joseph and
verne of the negligence of the Defendant, William Gordon Smith,
all of her injuries and damages were caused as a proximate cause
medical, hospital and doctor treatment; and plaintiff avers that
injured and was forced to spend much time and money in and about
made sick, sore and nervous; she was injured and permanently in-
to a hospital for treatment for approximately three weeks; she was
she suffered multiple fractures and dislocations; she was confined
surgery to remove her spleen; she suffered a shattered left ankle;
chestion; her spleen was ruptured and she was forced to undergo
suffered multiple facial lacerations; she suffered a brain con-
was caused so be unconscious for approximately eighteen hours; she
employee, the plaintiff was injured and damaged as follows: the
the time and scope of his authority as such agent, servant or

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

November 2, 1960

Sheriff's Department
Mobile County
P. O. Box 113
Mobile, Alabama

Attention: Mrs. Sirmon

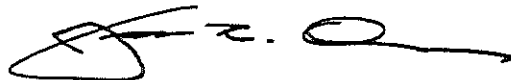
Gentlemen:

I enclose additional copies of the complaints in the three cases against William Gordan Smith and Sears, Roebuck Company, which you called me about last Friday.

After you called me, one of the adjusters for the insurance company called me and it now appears as if this case may be settled. For this reason, I wish you would hold these complaints for several more days before serving them on the defendants, as it is possible that the case may be settled in the near future and it will not be necessary that the complaints be served.

I appreciate very much your calling me about these cases and I will write you later on this week as to whether or not the defendants should be served.

Yours very truly,



JAMES R. OWEN

JRO/ers

Enclosures

STATE OF ALABAMA)
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BALDWIN COUNTY)

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WITNESS my hand, this 27 day of October, 1960.

Heinz Kueck
Clerk

NOMA E. RIDER,

Plaintiff,

VS.

WILLIAM GORDAN SMITH and
SEARS, ROEBUCK AND COMPANY,
A Corporation,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
4469

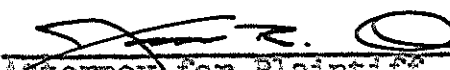
C O M P L A I N T
COUNT ONE

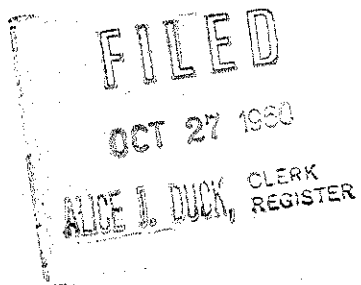
The Plaintiff claims of the Defendants TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) for that heretofore on to-wit, July 28, 1960, the Defendant, William Gordan Smith, so negligently operated an automobile truck along and upon County Highway No 86 in Baldwin County, Alabama, at a point 500 feet East of the Bay Minette Creek Bridge as to cause the said automobile truck to run into, upon or against an automobile which the Plaintiff was driving and where she had a right to be, and as a proximate result and consequence of the negligence of the said William Gordan Smith, who was at said time and place an agent, servant or employee of the Defendant, Sears, Roebuck and Company, a Corporation, acting within

the line and scope of his authority as such agent, servant or employee, the Plaintiff was injured and damaged as follows: She was caused to be unconscious for approximately eighteen hours; she suffered multiple facial lacerations; she suffered a brain concussion; her spleen was ruptured and she was forced to undergo surgery to remove her spleen; she suffered a sprained left ankle; she suffered multiple abrasions and contusions; she was confined to a hospital for treatment for approximately three weeks; she was made sick, sore and nervous; she was injured and permanently injured and was forced to spend much time and money in and about medical, hospital and doctor treatment; and plaintiff avers that all of her injuries and damages were caused as a proximate consequence of the negligence of the Defendant, William Gordan Smith, an agent, servant or employee of the Defendant, Sears, Roebuck and Company, a Corporation, while acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by jury of said cause.


Attorney for Plaintiff

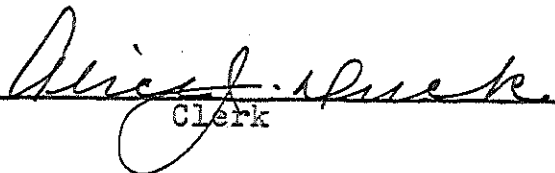


STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William Gordan Smith and Sears, Roebuck and Company, a Corporation, 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 Alice Gail Rider, a minor, suing by Sibley Rider, as her next friend.

WITNESS my hand, this 27 day of October, 1960.


Clerk

ALICE GAIL RIDER, a Minor,)
suing by Sibley Rider, as)
her next friend,)
Plaintiff,)
VS.)
WILLIAM GORDAN SMITH and SEARS,)
ROEBUCK AND COMPANY, a Corpo-)
ration,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
4471

C O M P L A I N T


COUNT ONE

Plaintiff claims of the Defendants the sum of THIRTY-FIVE HUNDRED DOLLARS (\$3500.00) for that heretofore on to-wit, July 28, 1960, the Defendant, William Gordan Smith, so negligently operated an automobile truck along and upon County Highway No. 86 in Baldwin County, Alabama, at a point 500 feet East of the Bay Minette Creek Bridge so as to cause the said automobile truck which the Defendant was operating to run into, upon, or against an automobile in which the Plaintiff was riding and as a proximate consequence of the negligence of the said Defendant the Plaintiff was injured and damaged as follows: She suffered an abrasion of her

chin; she suffered edema of her jaw; she suffered severe chest pains; she suffered multiple abrasions and contusions and was caused much pain and suffering as a result thereof. Plaintiff further avers that all of her injuries and damages were caused as a proximate result of the negligence of the Defendant, William Gordan Smith, who was at such time and place complained of an agent, servant or employee of the Defendant, Sears, Roebuck and Company, a Corporation, acting within the line and scope of his authority as such agent, servant or employee.


Attorney for Plaintiff

Plaintiff demands a trial of
said cause by jury.


Attorney for Plaintiff

FILED
OCT 27 1960
ALICE L. DUCK, CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

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WITNESS my hand, this 27 day of October, 1960.

Alvin J. Luck
Clerk

NOMA E. RIDER,

Plaintiff,

VS.

WILLIAM GORDAN SMITH and
SEARS, ROEBUCK AND COMPANY,
A Corporation,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendants TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) for that heretofore on to-wit, July 28, 1960, the Defendant, William Gordan Smith, so negligently operated an automobile truck along and upon County Highway No 86 in Baldwin County, Alabama, at a point 500 feet East of the Bay Minette Creek Bridge as to cause the said automobile truck to run into, upon or against an automobile which the Plaintiff was driving and where she had a right to be, and as a proximate result and consequence of the negligence of the said William Gordan Smith, who was at said time and place an agent, servant or employee of the Defendant, Sears, Roebuck and Company, a Corporation, acting within

the line and scope of his authority as such agent, servant or employee, the Plaintiff was injured and damaged as follows: She was caused to be unconscious for approximately eighteen hours; she suffered multiple facial lacerations; she suffered a brain concussion; her spleen was ruptured and she was forced to undergo surgery to remove her spleen; she suffered a sprained left ankle; she suffered multiple abrasions and contusions; she was confined to a hospital for treatment for approximately three weeks; she was made sick, sore and nervous; she was injured and permanently injured and was forced to spend much time and money in and about medical, hospital and doctor treatment; and plaintiff avers that all of her injuries and damages were caused as a proximate consequence of the negligence of the Defendant, William Gordan Smith, an agent, servant or employee of the Defendant, Sears, Roebuck and Company, a Corporation, while acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by jury of said cause.


Attorney for Plaintiff

COMPLAINT 4469

355

NOMA E. RIDER,

Plaintiff,

VS.

WILLIAM GORDAN SMITH and
SEARS, ROEBUCK AND COMPANY,
A Corporation,

Defendants.

Returned H-25-60
Without Action By Order of Atty
RAY D. BRIDGES, Sheriff
By A. L. Simon D. S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA