

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 Gloria Jean Rider, a minor, suing by Sibley Rider, as her next friend.

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

Alice F. Buck
Clerk

GLORIA JEAN 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

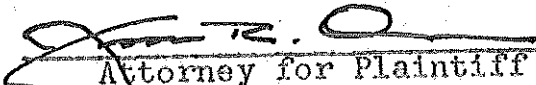
4470

C O M P L A I N T

COUNT ONE

Plaintiff claims of the Defendants TWENTY THOUSAND AND NO/100 DOLLARS (\$20,000.00) 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 so as to cause the said automobile truck to run into, upon or against an automobile in which the Plaintiff was riding and as a proximate consequence of the negligence of the Defendant, 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 suffered multiple lacerations of her forehead requiring twenty stitches to close; she suffered a T shaped laceration bisecting her tongue for approximately one and one-half inches in length and splitting laterally; she was required to stay confined in a hospital for medical treatment for approximately six days; she incurred large medical, doctor and hospital bills; she was made sick, sore and nervous; she suffered multiple abrasions and contusions; she was injured and permanently injured all as a proximate result of the negligence of the Defendant, 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, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by jury
of said cause,


Attorney for Plaintiff

FILED

OCT 27 1960

ALICE J. DUCK, CLERK
REGISTER

GLORIA JEAN RIDER, a MINOR
suing by and through SIBLEY
RIDER, as her next friend,

Plaintiff,

Vs

SEARS, ROEBUCK AND COMPANY,
a Corporation and WILLIAM GORDON
SMITH,

Defendants.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY ALABAMA

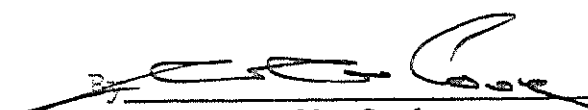
) AT LAW

) NO _____

Come now the defendants through Lyons, Pipes and Cook, and
enter this their appearance, and for answer to the plaintiff's
complaint say as follows:

1. That they are not guilty.

LYONS, PIPES AND COOK
Attorneys for Defendants


Walter M. Cook

FILED
NOV 18-60

ALICE J. DUCK, CLERK
REGISTER

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*
BALDWIN COUNTY)

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


Clerk

GLORIA JEAN 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

4470

COMPLAINT

COUNT ONE

Plaintiff claims of the Defendant TWENTY THOUSAND AND NO/100 DOLLARS (\$20,000.00) 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 so as to cause the said automobile truck to run into, upon or against an automobile in which the Plaintiff was riding and as a proximate consequence of the negligence of the Defendant, 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 suffered multiple lacerations of her forehead requiring twenty stitches to close; she suffered a T shaped laceration bisecting her tongue for approximately one and one-half inches in length and splitting laterally; she was required to stay confined in a hospital for medical treatment for approximately six days; she incurred large medical, doctor and hospital bills; she was made sick, sore and nervous; she suffered multiple abrasions and contusions; she was injured and permanently injured all as a proximate result of the negligence of the Defendant, 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, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by jury
of said cause.


Attorney for Plaintiff

STATE OF ALABAMA)
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BALDWIN COUNTY)

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


Clerk

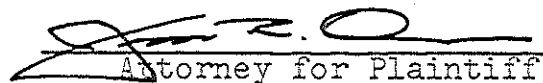
GLORIA JEAN RIDER, a Minor,)
suing by Sibley Rider, as)
her next friend,)
Plaintiff,)
VS.)
WILLIAM GORDAN SMITH and SEARS,)
ROEBUCK AND COMPANY, a Corpo-)
ration,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T
COUNT ONE

Plaintiff claims of the Defendants TWENTY THOUSAND AND NO/100 DOLLARS (\$20,000.00) 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 so as to cause the said automobile truck to run into, upon or against an automobile in which the Plaintiff was riding and as a proximate consequence of the negligence of the Defendant, 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 suffered multiple lacerations of her forehead requiring twenty stitches to close; she suffered a T shaped laceration bisecting her tongue for approximately one and one-half inches in length and splitting laterally; she was required to stay confined in a hospital for medical treatment for approximately six days; she incurred large medical, doctor and hospital bills; she was made sick, sore and nervous; she suffered multiple abrasions and contusions; she was injured and permanently injured all as a proximate result of the negligence of the Defendant, 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, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by jury
of said cause.


Attorney for Plaintiff

COMPLAINT

4470

GLORIA JEAN 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.

Returned 11-25-60
Without Action By Order of ally
RAY D. BRIDGES, Sheriff
By A. J. Jernigan D. S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA