

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.

Alice J. Duck
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

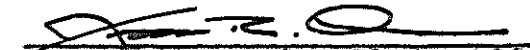
4471

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

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.

Alice S. Sibley
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

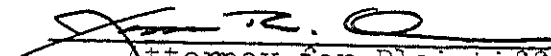
4471

C O M P L A I N T

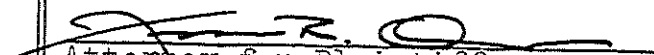
COUNT ONE

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

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.

Returned 11-25-60
Without Action By Order of Atty
RAY D. BRIDGES, Sheriff
By A. Surmon D. S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

ALICE GAILL 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

By


Walter M. Cook

FILED

NOV 18 1960

ALICE I. DICK, CLERK
REGISTER