

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WITNESS my hand, this 22 day of July, 1960.

W. J. Duck  
Clerk

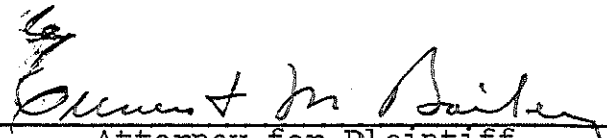
JAKE COLEMAN :  
Plaintiff :  
vs. :  
THELMA A. SUGGS :  
Defendant :

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

The Plaintiff claims of the Defendant \$20,000.00 for that, on to-wit, May 11, 1960, the Defendant Thelma A. Suggs, negligently caused or allowed an automobile which she was then and there operating on a public road, to-wit, Twin Beach Road at a point approximately one-half mile Southeast of Highway 98 near Fairhope, Baldwin County, Alabama to run upon or against Queenie Bernice Coleman, the Plaintiff's daughter, as approximate result of which negligence the Plaintiff's said daughter was so injured that she died on, to-wit, May 11, 1960, as approximate result of her said injuries.

Plaintiff claims of the Defendant \$20,000.00 for that, on to-wit, May 11, 1960, the Defendant Thelma A. Suggs, wantonly injured the Plaintiff's daughter, Queenie Bernice Coleman, by wantonly causing or allowing an automobile, which said Defendant was then and there driving on a public road, to-wit, Twin Beach Road at a point approximately one-half mile Southeast of Highway 98 near Fairhope, Baldwin County, Alabama to run upon or against Plaintiff's

said daughter, as approximate result of which said wanton conduct, the Plaintiff's said daughter was injured so that she died on, to-wit, May 11, 1960, as approximate result of her said injuries.

  
\_\_\_\_\_  
Attorney for Plaintiff

Plaintiff demands trial by jury of the above styled cause.

  
\_\_\_\_\_  
Attorney for Plaintiff

Received 22 day of July 19 60  
and on 28 day of July 19 60  
served a copy of the within compt.  
on \_\_\_\_\_

By service on Thelma Suggs

TAYLOR WILKINS, Sheriff  
By W.O. Garner D. S.  
Fhope

Sheriff claims 70 miles at  
Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff  
BY Garner  
DEPUTY SHERIFF

70.4336

BILL OF COMPLAINT

PLAINTIFF: Jake Coleman

DEFENDANT: Thelma A. Suggs

FILED

JUL 28 1960

ALICE L. DUCK, CLERK  
REGISTER

Defendant lives.  
on Twin Beach Rd.  
Fhope Ala

ERNEST M. BAILEY  
ATTORNEY AT LAW  
FAIRHOPE, ALABAMA

ERNEST M. BAILEY  
ATTORNEY AT LAW  
221 FAIRHOPE AVENUE  
FAIRHOPE, ALABAMA  
PHONE WA 8-9759


JULY  
20th  
1960

Mrs. Alice Duck, Clerk Circuit Court, Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

I will appreciate you filing the attached Bill  
of Complaint and have the same served.

Very truly yours,

  
Ernest M. Bailey  
EMB/w