

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Harry L. Linden and Donald C. Linden, individually and doing business as partners under the firm name and style of Linden Construction Company, and Donald E. Cooper 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 same, then and there to answer the complaint of Eula Hammac.

Witness my hand this 27 day of October, 1960.

Alice J. Lemak
Clerk

EULA HAMMAC,

Plaintiff

VS

HARRY L. LINDEN and DONALD C. LINDEN, individually and doing business as partners under the firm name and style of LINDEN CONSTRUCTION COMPANY and DONALD E. COOPER,

Defendants

) IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

) AT LAW. NO.

2566

COUNT ONE

The plaintiff claims of the Defendants the sum of Thirty Five Thousand Dollars (\$35,000.00) as damages for that on, to-wit, November 20, 1959, the defendant, Donald E. Cooper, who was then and there the agent, servant or employee of the defendants, Harry L. Linden and Donald C. Linden, individually and doing business as partners under the firm name and style of Linden Construction Company and while acting within the line and scope of his employment as such agent, servant or employee so negligently operated

a motor vehicle which he was then and there driving on Armstrong Avenue, a public street in Baldwin County, Alabama, within the city limits of Bay Minette, Alabama, at the point where Armstrong Avenue intersects with U. S. Highway 31 as to cause or allow such motor vehicle to run into or against an automobile in which the plaintiff was riding at said time and place and which was then and there being driven along U. S. Highway 31, where the plaintiff had a right to be, and as a proximate result of the negligence of such defendants the plaintiff was injured in this: she sustained a fracture of her left clavicle; a fracture of her 5th metatarsal, left foot; she suffered severe ligamentous injuries; she suffered a fracture to the left great toe; she suffered multiple contusions and abrasions to her body; she developed pneumonia with alveolitis; she suffered residual arthritis; she was caused to suffer and still does suffer severe physical and mental pain and anguish; she was permanently injured; she was caused to incur large medical and hospital bills in an effort to heal and to cure her injuries and she was rendered permanently less able to earn a livelihood, all to the great damage of the plaintiff in the sum aforesaid, hence this suit.

Chas. Stone

Thos. M. Carr, Jr.
ATTORNEYS FOR PLAINTIFF

Plaintiff demands a trial by jury.

Chas. Stone

Thos. M. Carr, Jr.
ATTORNEYS FOR PLAINTIFF

FILED

OCT 27 1960

ALICE J. DUCK, CLERK
REGISTER

770-4466

Received 27 day of Oct 1966
and on 29 day of Oct 1966
I served a copy of the within Q.C.C.
on HARRY L. LINDEN
DONALD C. LINDEN
By service on DONALD E. COOPER
11-1-60

TAYLOR WILKINS, Sheriff
By Garnett & Steadham D. S.
Silvershill & Robb

Sheriff claims 170 miles at
Ten Cents per mile Total \$ 17.00
TAYLOR WILKINS, Sheriff
BY Garnett & Steadham
DEPUTY SHERIFF

EULA HAMMAC,

Plaintiff

VS.

HARRY L. LINDEN and DONALD C.
LINDEN, individually and doing
business as partners under the
firm name and style of LINDEN
CONSTRUCTION COMPANY and DONALD
E. COOPER,

Defendants

SUMMONS AND COMPLAINT

FILED

OCT 27 1960

ALICE J. DUCK, CLERK
REGISTER

HUGH M. CAFFEY, JR.

ATTORNEY AT LAW
BREWTON, ALABAMA

HUGH M. CAFFEY, JR.
ATTORNEY AT LAW
BREWTON, ALABAMA

