

EMILY B. TILLMAN

PLAINTIFF

-VS-

JAMES L. WOODYARD JR.,

DEFENDANT

IN THE CIRCUIT COURT OF

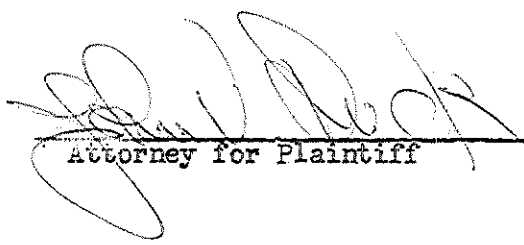
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4361

AMENDED BILL OF COMPLAINT

Comes now the Plaintiff in the above styled cause, and amends her bill of complaint by striking the name "JAMES" from the name of the defendant, and substituting therefor the name "JOHN" so that the defendants' names is JOHN L. WOODYARD JR.


Attorney for Plaintiff

NO. ~~88~~ 4361

Received 23 day of Aug 1960
and on 26 day of Aug 1960
I served a copy of the within Am. Comp.
on John L. Woodyard Jr.
By service on _____

TAYLOR WILKINS, Sheriff

By L. P. Childress D.S.

J. L. Wilkey

Sheriff claims 22 miles at
Ten Cents per mile Total \$ 2.20
TAYLOR WILKINS, Sheriff
BY Childress
DEPUTY SHERIFF

EMILY B. TILLMAN

PLAINTIFF

VS.

JOHN L. WOODYARD JR.,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Bill of Complaint
4nd.

AMENDED BILL OF COMPLAINT

James L. Wilkey
4 weeks for a
Master V.C.

FILED
AUG 23 1960
ALICE J. DUCK, CLERK
REGISTER

EMILY B. TILLMAN

Plaintiff

VS

JAMES L. WOODYARD JR.

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

Plaintiff claims of the Defendant, JAMES L. WOODYARD JR., the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages for that heretofore and on to-wit; 29th day of June, 1960. Plaintiff was operating her automobile along U. S. Highway No. 90, traveling in an Easterly direction and at a point thereon approximately twenty-five yards from the Baldwin County Line, and said highway being then and there a Public Highway in Baldwin County, Alabama, at approximately ten P. M. (10:00 p.m.) and at said time and place, JAMES L. WOODYARD JR., so negligently operated a motor vehicle on said highway as to cause his said motor vehicle to run into or upon or against or into the said vehicle of Plaintiff which said negligent operation by the defendant, JAMES L. WOODYARD JR., caused the Plaintiff's automobile to lurch forward, and as a proximate consequent thereof; (a) the rear end of the Plaintiff's automobile was smashed, broken, and otherwise bent, broken, damaged and plaintiff was caused to loose the use of her said automobile for a long period of time.

(b) That said Plaintiff suffered injuries in that she suffered a severe whiplash of her spine and neck, that her left wrist was sprained, and that her left ankle was sprained, and that she suffered shock, her nervous system was injured and she was made otherwise sick, lame, sore, and confined to bed for a period of time and was and will continue in the future to suffer great physical pain and mental anguish and she was permanently injured and Plaintiff incurred and will in the future incur expenses for medical attention and treatment in connection with the injuries suffered by her.


Attorney for Plaintiff

Defendant resides in Foley, Alabama

FILED

JUN 30 1960

ALICE I. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James L. Woodyard Jr.

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against James L. Woodyard

_____, Defendant...

by Emily B. Tillman

_____, Plaintiff...

Witness my hand this 1 day of Aug 1960

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Henry J. ..., Clerk

No. 4361

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Emily B. Tillman

Plaintiffs

vs.

James H. Woodyard Jr.

Defendants

Summons and Complaint

Filed

19

Clerk

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Defendant lives Foley, Ala.

Received In Office

8/11 1960

Sheriff

I have executed this summons

this _____ 19

by leaving a copy with

Returned 6 day of August 1960
Not found in my county after diligent search and
inquiry.

By Taylor Wilkins Sheriff
Deputy Sheriff

Sheriff

Deputy Sheriff