

STATE OF ALABAMA,
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon COLUMBUS HORTON 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 BELLE EUBANKS.

WITNESS my hand this the 29 day of June, 1960.

Alice J. Duck
CLERK

EX-7-7-60

C O M P L A I N T

BELLE EUBANKS,
Plaintiff,
VS.
COLUMBUS HORTON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 2304

C O U N T O N E

The plaintiff claims of the defendant \$15,000.00 as damages for that heretofore on, to-wit: the 13th day of November, 1959, the defendant so negligently operated an automobile on one of the public highways in Baldwin County, Alabama, to-wit, U. S. Highways Numbers 90 and 31, on the Mobile Bay Causeway, near the Sea Ranch Restaurant, that the same was run into, upon or against an automobile in which plaintiff was sitting, and as a proximate consequence thereof plaintiff's back was badly wrenched and sprained and bruised, she suffered bad sprains to her lumbar and cervical spine, her body was greatly bruised, her back was permanently injured, she was caused to suffer great physical and mental pain and anguish, and her nervous system was greatly impaired and shocked, and was permanently impaired and shocked, and she was caused to incur expense in and about curing and healing her said injuries, and she was caused to lose time from her work. And plaintiff avers that she suffered said injuries and consequent damages as a proximate consequence of the aforesaid negligence of the defendant; hence this suit.

Plaintiff demands a trial by jury in this cause.

FILED

JUN 29 1960

ALICE J. DUCK, Clerk

245

Jeffrey H. Madiburne
ATTORNEY FOR PLAINTIFF

22/4 RECORDED 145

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 4304

BELLE EUBANKS,
Plaintiff,
VS.
Columbus Horton
COLUMBUS HORTON,
Defendant.

SUMMONS AND COMPLAINT.

Defendant is presently
residing at:

257 South Conception St.,
Mobile, Alabama

FILED
JUN 29 1960
ALICE J. DUCK, Clerk

EXECUTED

This 7 day of July, 1960
by serving a copy of the within on
Columbus Horton
RAY D. BRIDGES, Sheriff
By R. M. Foster D. S.

RECEIVED

JUL 21 1960

SHERIFF'S OFFICE

STATE OF ALABAMA,
COUNTY OF BALDWIN.

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You are hereby commanded to summon COLUMBUS HORTON 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 BELLE EUBANKS.

WITNESS my hand this the 29 day of June, 1960.

Alice J. Luck
CLERK

C O M P L A I N T

BELLE EUBANKS,
Plaintiff,

VS.

COLUMBUS HORTON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 2314

C O U N T O N E

The plaintiff claims of the defendant \$15,000.00 as damages for that heretofore on, to-wit: the 13th day of November, 1959, the defendant so negligently operated an automobile on one of the public highways in Baldwin County, Alabama, to-wit, U. S. Highways Numbers 90 and 31, on the Mobile Bay Causeway, near the Sea Ranch Restaurant, that the same was run into, upon or against an automobile in which plaintiff was sitting, and as a proximate consequence thereof plaintiff's back was badly wrenched and sprained and bruised, she suffered bad sprains to her lumbar and cervical spine, her body was greatly bruised, her back was permanently injured, she was caused to suffer great physical and mental pain and anguish, and her nervous system was greatly impaired and shocked, and was permanently impaired and shocked, and she was caused to incur expense in and about curing and healing her said injuries, and she was caused to lose time from her work. And plaintiff avers that she suffered said injuries and consequent damages as a proximate consequence of the aforesaid negligence of the defendant; hence this suit.

Plaintiff demands a trial by jury in this cause.

Jeffrey J. Madiburn
ATTORNEY FOR PLAINTIFF

