

KENNETH E. NORRIS,
PLAINTIFF
VS
JOHN A. NORRIS, SR.
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

41638

COMPLAINT

Count One

Plaintiff claims of the Defendant Two Hundred Fifty Thousand and NO/100 (\$250,000.00) Dollars as damages, for that heretofore on, to-wit, the 4th day of August 1960, in the forenoon of that day, the Plaintiff, while in the employ of the Defendant and while working as a carpenter at a certain house owned by the Plaintiff adjoining the Harvey Underwood Road, in Baldwin County, Alabama, in the performance of his duties and in the course of his employment, as a direct and proximate consequence of the negligence of the Plaintiff, fell through the open ceiling rafters of the said house; thereby dislocating his spine; receiving a severe injury to his head, brain, and mind; paralyzing his nervous system; injuring, impairing and affecting his mind; causing him great suffering, pain and agony; causing Plaintiff to incur expenses of doctors, hospitals, nurses, x-rays, and drugs in and about the care and treatment of his injuries as aforesaid; permanently incapacitating Plaintiff from performing his daily work and labor and any work and labor; and permanently impairing the mind, health, physical condition and nervous system of the Plaintiff, all to Plaintiff's injury, hence this suit.


Attorney for Plaintiff

DEMAND FOR TRIAL BY JURY

Plaintiff demands trial by jury.


Attorney for Plaintiff

FILED
MAR 18 1961
ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. _____

TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon John A. Norris, Sr.

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 _____

John A. Norris, Sr., Defendant.

by _____, Plaintiff.

Kenneth E. Norris

Witness my hand this 16 day of March 1961

Alice J. Newkirk, Clerk

Exp 3-26-61

STATE of ALABAMA

Baldwin County

CIRCUIT COURTKenneth E. Norris

Plaintiffs

vs.

John A. Norris, Sr.

Defendants

Summons and Complaint

Filed

FILED

19____

MAR 16 1961

Clerk

ALICE J. DUCK, CLERK-REGISTERJames A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Foley, Alabama

Received In Office

March 16, 1961Taylor Wilkins

Sheriff.

I have executed this summons

this 22 March 1961
by leaving a copy with _____John A. Norris Sr.Sheriff claims 84 miles at
Ten Cents per mile Total \$ 8.40
TAYLOR WILKINS, Sheriff

BY _____

DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Paul L. [Signature]

Deputy Sheriff.

Margaret A. [Signature]

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

March 28, 1961

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Kenneth Norris
Vs: John A. Norris, Sr.

4638

Dear Mrs. Duck:

Please enter a non-suit in the above case, and send
the cost bill to the Plaintiff at Foley.

Thank you.

Sincerely,


James A. Brice

JAB:j