

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Hale Manufacturing Company, Inc. to appear and plead, answer or demur within thirty days from the service hereto to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, by Jerry T. Glover.

Witness my hand this the 22 day of March, 1962.

Alice J. Duck  
Alice J. Duck, Clerk

JERRY T. GLOVER

Plaintiff

VS

HALE MANUFACTURING COMPANY,  
INC, a Corporation

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5-086

1.

The Plaintiff claims of the Defendant the sum of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) as damages for that heretofore on, to-wit, the 24th day of March 1961, the Plaintiff was employed by and working for the Defendant, installing electrical wiring in Defendants' place of business in Foley, Alabama. That at this time and place, the Defendant acting by and through its agent, servant or employee negligently furnished the Plaintiff a scaffold to stand on and work from, which was too narrow and light for its height. The Plaintiff avers that when he was climbing this scaffold it tipped over and as a direct and proximate consequence of said negligence Plaintiff fell to the floor and broke both legs and feet. He was permanently injured; caused to suffer much mental and physical pain and put to great expense in employing medical aid, all to the loss of the Plaintiff in the aforesaid amount.

WILKERS, BRANTLEY & NESBIT

BY: William M. Brantley

Attorneys at Law

Plaintiff demands a trial  
by Jury.

FILED

MAR 22 1962

ALICE J. DUCK, CLERK  
REGISTER

184

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5086

JERRY T. GLOVER

Plaintiff

VS

HALE MANUFACTURING COMPANY,  
INC.

Defendant

FILED

MAR 28 1962

ALICE J. DUCK, CLERK  
REGISTER

Walters, Brantley & Nesbit  
Box 555  
Robertsdale, Alabama

Received 22 day of Mar 1962

and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

was served a copy of the within etc

Hale Manufacturing  
Co.

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By \_\_\_\_\_

*No agent at  
the plant.  
See slip attached*

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JERRY T. GLOVER

Plaintiff

VS

HALE MANUFACTURING COMPANY,  
INC, a Corporation

Defendant

Q

Q

Q

Q

Q

Q

1.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

FILED  
MAR 22 1962  
CLERK  
REGISTRAR

The Plaintiff claims of the Defendant the sum of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) as damages for that heretofore on, to-wit, the 24th day of March 1961, the Plaintiff was employed by and working for the Defendant, installing electrical wiring in Defendants' place of business in Foley, Alabama. That at this time and place, the Defendant acting by and through its agent, servant or employee negligently furnished the Plaintiff a scaffold to stand on and work from, which was too narrow and light for its height. The Plaintiff avers that when he was climbing this scaffold it tipped over and as a direct and proximate consequence of said negligence Plaintiff fell to the floor and broke both legs and feet. He was permanently injured; caused to suffer much mental and physical pain and put to great expense in employing medical aid, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS, BRANTLEY & NESBIT

BY: Robert M. Brantley  
Attorneys at Law

Plaintiff demands a trial  
by Jury.