and the second

(Reference: 85-CP-23-2370).

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- 2. The amount of the plaintiff's claim against the defendants is One Million (\$1,000,000.00) Dollars.
- 3. The grounds of the plaintiff's claim against the defendants are that the defendant, Walter Allen Greene, while under the direction and control and as the agent of Jackson E. Greene and Greendale Farms wilfully caused the plaintiff serious injury by making an improper left turn into and colliding with the vehicle which the plaintiff was a passenger.
- 4. The medical expenses for the Plaintiff are Seven Thousand, six hundred and twenty-five (\$7,625.00) Dollars as of the date of this affidavit. The Plaintiff is being treated by Dr. Edward Bray, an orthopedist, and Dr. Barry Bishop, a plastic surgeon, both of whom have advised the affiant that the future medical bills of the Plaintiff could be as high as Twenty Thousand (\$20,000.00) Dollars.
- 5. The Plaintiff was a passenger in a car driven by Kate Whitmire, who had coverage with State Farm Insurance. The affiant has been informed by Nat Poston, an adjuster for State Farm Insurance who investigated the case, that the Defendants had no insurance coverage whatsoever.
- 6. The affiant and the Plaintiff are concerned that, in the event they obtain a judgment against the Defendants, they would have to satisfy the judgment from assets held by the Defendants, which consist mainly of family-held farm property and the family home. The affiant is informed and believes that the Defendants, if faced with



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