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Willie Mallory Complaint

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In The Circuit Court Of The City Of Richmond

Second November Rules--1917.

Willie Mallory complains of A. S. Priddy of a plea of trespass on the case, To Wit:-

That heretofore to wit, on the 14th day of October 1916, the plaintiff was a resident and citizen of the city of Richmond, and the defendant caused her by and through his directions to be illegally carried from the city of Richmond to the County of Amherst, and illegally and wrongfully deprived her of her liberty, and kept her wrongfully and illegally in his custody, and under his control for several months, by force, threats and personal violence, and by fear of bodily harm, and while so in his custody, and under his personal control, the said defendant by force, and violence, placed her under ether, or other anesthetic, and while she was then, and there, unconscious, performed an operation upon her by removing her genital organs, or sterilizing her, and unsexing her, and destroying her power to bear children, and caused her great mental and physical suffering by keeping her in dread of said operation, and has also caused her great pain in being healed since said operation by reason of the same.

And also thereby inflicted upon her great pain and discomfort of body, *and deprived her of her comfort + associating of her family,* and worry of mind, and so deprived her, by said illegal imprisonment, of her daily wages, to wit, \$1.25 per day, from that time until, to wit, July 1st, 1917, during which time the defendant illegally compelled the plaintiff to work for no compensation.

Whereby reason of the said wrongful and illegal assaults, and batteries, and acts on the part of the said defendant, the plaintiff has sustained great damage, to wit, the sum of \$5,000.00.

And for this also, to wit, that heretofore, to wit, on the ~~14th~~ day, and year last aforesaid, the said plaintiff while in the custody of the defendant, under the circumstances set out above in the first court of this declaration, which court is hereby made a part hereof, as fully as may be necessary, and proper, and while being in the custody of said defendant, was placed by him, or caused to be placed by him, in a dungeon, or small room, in the dark, and in a cramped condition, and made to remain there from 3 o'clock A. M. until right

for the purpose of terrorizing her and punishing her because she sought to free herself, and leave the custody of the said defendant.

Whereby reason of said wrongful acts aforesaid the plaintiff has sustained great damage in her health and physical condition, has suffered great physical and mental pain, and discomfort, and otherwise has sustained great damages, to wit, \$5,000.00, and therefore, she brings her suit.

Smith & Smith
and
R.W. Joy p.g.

5000 damage suit
for skin pain