

WILLIAM M. STANLEY,

Plaintiff,

vs.

WILSON HAYES, as Administrator
of the Estate of Evelyn Shores,
deceased,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5192

Comes the Defendant in the above styled cause and for plea
to Count One of the complaint says:

1. Not guilty.
2. That the allegations of the complaint are untrue.

FILED

AUG 9 1932

Basow & Stone
Attorneys for Defendant

ALICE J. DUCK, CLERK
REGISTER

5192

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WILLIAM M. STANLEY,
Plaintiff,

vs.

WILSON HAYES, as Administrator
of the Estate of Evelyn Shores,
deceased,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

AUG 9 1922

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Wilson Hayes, as Administrator of the Estate of Evelyn Shores, Deceased, 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 William M. Stanley.

WITNESS my hand this 2 day of July, 1962.

Alice J. Luck
Clerk

* * * * *

WILLIAM M. STANLEY,)	
)	
Plaintiff,)	
)	IN THE CIRCUIT COURT OF
VS.)	
)	BALDWIN COUNTY, ALABAMA
WILSON HAYES, as Administrator)	
of the Estate of Evelyn Shores,)	AT LAW
Deceased,)	
)	5192
Defendant.)	

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendant the sum of Seventy-five Hundred Dollars (\$7500.00) for that heretofore on to-wit, September 27, 1961, the Plaintiff's wife, Betty Jean Stanley, was a guest passenger in a vehicle owned and operated by the Defendant's intestate and while said vehicle was being driven at the said time in a westerly direction on a public highway in Alabama, namely, Highway 98, located in Baldwin County, Alabama, at a place on said highway about one-half mile east of the center of Foley, Alabama, the Defendant's intestate did wantonly injure the Plaintiff's said wife by willfully and wantonly causing, allowing, or permitting the said vehicle to turn over on said road several times, and as a direct and proximate cause of said willfulness and wantonness the Plaintiff's said wife was willfully and wantonly injured in this: she was caused to suffer multiple lacerations of the face and a

sterno-clavicular separation; she suffered much pain and was confined to bed for a long period of time and Plaintiff was caused much expense for hospital bills, medical bills, doctor bills and the expenses incident thereto in obtaining medicines and medical aid and surgical attention for his said wife and was caused expense in the employment of doctors and physicians and surgeons in and about his efforts to heal and cure his said wife's injuries and Plaintiff was caused to lose time from his customary work and labor and duties and was caused much inconvenience in attending and nursing his said wife in an effort to alleviate her condition and lost the services of his wife and her companionship or consortium for a long period of time, hence this suit.

MOORE, SIMON & LAYDEN and
JAMES R. OWEN

By S. R. O.
Attorneys for Plaintiff

Plaintiff demands a trial by jury of said cause.

MOORE, SIMON & LAYDEN and
JAMES R. OWEN

By S. R. O.
Attorneys for Plaintiff

FILED

JUL 23 1962

ALICE L. DUCKWORTH
CLERK
REGISTER

62-7-9-62

Received 2 day of July 1962
and on 9 day of July 1962
I served a copy of the within 1962
on Wilson Hayes
By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbot
omi

WILLIAM M. STANLEY,

Plaintiff,

VS.

WILSON HAYES, as Administrator
of the Estate of Evelyn Shores,
Deceased.

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

JUL 2 1962

Alice J. Duck, CLERK
REGISTER

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

WILLIAM M. STANLEY,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
WILSON HAYES, as Adminis-	X	
trator of the Estate of	X	AT LAW
Evelyn Shores, Deceased,	X	
Defendant.	X	

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That said complaint does not allege that the Defendant's intestate willfully or wantonly allowed or willfully or wantonly permitted the vehicle that she was driving to turn over.
3. That said complaint does not allege that the Plaintiff was employed by anyone at the time he alleges he was caused to lose time from his customary work and labor.
4. That the allegation that the Plaintiff was caused much inconvenience in attending and nursing his said wife does not state any cause of action or legitimate claim for damages against the Defendant.
5. That the Plaintiff does not allege how much time he lost from his work and labor as a result of the accident described in the complaint.
6. That the complaint does not allege how long a period of time is covered by his claim for loss of services and consortium.


 Attorneys for Defendant

FILED

JUL 16 1962

ALICE J. DUCK, CLERK
REGISTER

5792

WILLIAM M. STANLEY,

Plaintiff,

vs.

WILSON HAYES, as Adminis-
trator of the Estate of
Evelyn Shores, Deceased,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

DEMURRER

* * * * *

FILED

2-16-1962

ALICE J. DUCK, CLERK
REGISTER