

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERRIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon CLARENCE J. ARANT 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 C. Mulligan.

WITNESS my hand this 10 day of August, 1962.

Alice J. Luck
Clerk

The Defendant's address is
20 Hurlbert Street
Mobile, Alabama

5241

* * * * *

WILLIAM C. MULLIGAN

Plaintiff,

VS.

CLARENCE J. ARANT,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

The Plaintiff claims of the Defendant Six Hundred (600) Dollars for that heretofore on to-wit July 21, 1962, at a point on Highway 89, which is a public highway in Baldwin County, Alabama, at a point two miles east of Elberta, the Defendant so negligently operated motor vehicle so as to cause it to, upon, or against the automobile of Plaintiff and as a proximate result of the negligence of the said Defendant, Plaintiff's automobile was damaged in this: the left door, the left side and the left rear fender was bent, broken and damaged; the right rear fender was bent and damaged; the left rear tire was cut and the rear bumper was bent and demolished. Plaintiff avers that all of the damages to his said automobile were caused as a proximate result of the negligence of the Defendant as aforesaid, hence

this suit.


Attorney for Plaintiff

FILED

AUG 10 1962

ALICE J. DUCK, CLERK
REGISTER

EX-9-6-62

5241
WILLIAM C. MULLIGAN

Plaintiff,

VS.

6th Sm
CLARENCE J. ARANT,

Defendant.

IN THE CIRCUIT COURT OF
BLADWIN COUNTY, ALABAMA

AT LAW

EXECUTED
This 6 day of Sept, 1962
by serving a copy of the within on
Clarence J. Arant
RAY B. BRIDGES, Sheriff
by L B Smith D.S.

FILED
AUG 10 1962
AIME L. DICK, CLERK
REGISTER
RECEIVED

AUG 13 1962

SHERIFF'S OFFICE

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

WILLIAM C. MULLIGAN,
Plaintiff,
VS.
CLARENCE J. ARANT,
Defendant.

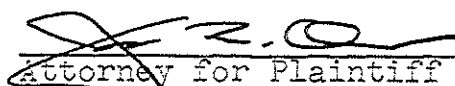
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

AMENDED COMPLAINT

Now comes the Plaintiff and amends the complaint heretofore filed in this cause so that as amended the said complaint will read as follows:

" The Plaintiff claims of the Defendant Six Hundred (600) Dollars for that heretofore on to-wit July 21, 1962, at a point on Highway 89, which is a public highway in Baldwin County, Alabama, at a point two miles east of Elberta, the Defendant so negligently operated motor vehicle so as to cause it to run into, upon, or against the automobile of Plaintiff and as a proximate result of the negligence of the said Defendant, Plaintiff's automobile was damaged in this: the left door, the left side and the left rear fender was bent, broken and damaged; the right rear fender was bent and damaged; the left rear tire was cut and the rear bumper was bent and demolished. Plaintiff avers that all of the damages to his said automobile were caused as a proximate result of the negligence of the Defendant as aforesaid, hence this suit.

/s/ JAMES R. OWEN
Attorney for Plaintiff"


Attorney for Plaintiff

FILED

OCT 3 1962

ALICE L. DUCK, CLERK
REGISTER

WILLIAM C. MULLIGAN,

Plaintiff,

vs.

CLARENCE J. ARANT,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

DEMURRER

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, to-wit;

1. That said complaint does not state a cause of action.
2. That the allegation in the complaint "so as to cause it to, upon, or against the automobile of Plaintiff" and does not allege a proper cause of action.

CHASON & STONE

By:

John Chason
Attorneys for Defendant

Defendant demands trial by jury.

Clarence Stone
Attorneys for Defendant

FILED

OCT 1 1962

ALICE L. DICK, CLERK
REGISTER

5241

DEMURRER

WILLIAM C. MULLIGAN,

Plaintiff,

vs.

CLARENCE J. ARANT,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

