

5260

HUGH HARTLEY, SR.,
Plaintiff

vs

JOYCE MORLEY and
W. A. MORLEY,
Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

The Plaintiff claims of the Defendant, Joyce Morley, Five Hundred Ninety-five Dollars (\$595.00) as damages for that heretofore on, to-wit, the 3rd day of September, 1961, a boat with outboard motor owned by the Plaintiff was being lawfully operated in Lake Shelby in Alabama Gulf State Park in Baldwin County, Alabama, where it had a right to be, at approximately 3:30 P. M., and then and there the defendant, Joyce Morley, while operating another boat with an outboard motor, negligently ran into, upon or against the starboard or right side of Plaintiff's boat, damaging the right side of his said boat by knocking a hole therein at the front seat; damaged or destroyed the windshield; damaged or destroyed the seat and back thereof; damaged or destroyed fittings; required refinishing and painting; all to the damage of the Plaintiff as aforesaid, and all as proximate result and consequence of the negligence of the Defendant, Joyce Morley as aforesaid.

COUNT TWO

The Plaintiff claims of the Defendant, W. A. Morley, the sum of Five Hundred Ninety-five Dollars (\$595.00) as damages for that heretofore on, to-wit, the 3rd day of September, 1961, the Defendant, Joyce Morley, while acting as the agent, servant and employee of the Defendant, W. A. Morley, and while acting within the line or scope of her employment as such agent, servant or employee, while operating a boat with an outboard motor, negligently ran into, upon or against the starboard or right side of Plaintiff's boat, damaging the right side of Plaintiff's boat by knocking a hole therein at the front seat; damaged or destroyed

fittings; required refinishing and painting; all to the damage of the Plaintiff as aforesaid, and all as proximate result and consequence of the negligence of the Defendant, Joyce Morley, while acting as the agent, servant and employee of the Defendant, W. A. Morley, and while acting in the line or scope of her employment as such agent, servant or employee.

*Plaintiff Demands
trial by jury
E. P. Krasaw*

E. P. Krasaw
Attorney for Plaintiff

FILED

AUG 29 1962

**ALICE L. DUCK, CLERK
REGISTER**

*We the jury find
for the defendant
Joyce Morley
William J. Duck
James*

5268

Bill of Complaint

Hugh Hartley, Sr.,

Plaintiff

vs

Joyce Morley and
W. A. Morley,

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

AUG 29 1962

ALICE J. DUCK, CLERK
REGISTER

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5260

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOYCE MORLEY & W.A. MORLEY

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the
Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

JOYCE MORLEY & W.A. MORLEY, Defendant

by HUGH HARTLEY, SR., Plaintiff

Witness my hand this 29th day of August 1962

Oliver J. Duck, Clerk

Exp-3-6-63

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HUGH HARTLEY, SR.

Plaintiffs

vs.

6444
JOYCE MORLEY & W.A. MORLEY

1904 Luckie Ave
Mobile, Ala
Defendants

SUMMONS and COMPLAINT

Filed August 29, 1962

Alice J. Duck, Clerk

RECEIVED

RECEIVED
SEP 12 1962
SHERIFF'S OFFICE

SHERIFF'S OFFICE

G.G. Chason

Plaintiff's Attorney

Defendant's Attorney

9/10/62

Defendant lives at

RECEIVED IN OFFICE

Mar 1, 1963

Sheriff

I have executed this summons

this Mar 6, 1963

by leaving a copy with

Joyce Morley &
W.A. Morley

RETURNED 9-21-62

Not found in my County after dili-
gent search

RAY D. BRIDGES
By H. G. Halley D. S.

Ray D. Bridges Sheriff
H. G. Halley Deputy Sheriff

HUGH HARTLEY, SR.,

Plaintiff,

VS.

JOYCE MORLEY and W. A.
MORLEY,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

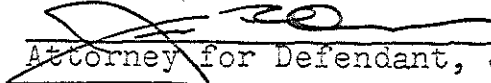
AT LAW

NO. 5260

DEMURRER

Now comes the defendant, Joyce Morley and demurs to the complaint heretofore filed in said cause and to each count thereof separately and severally and as grounds for said demurrer assign the following separately and severally:

1. The said count does not state a cause of action.
2. It is not described as sufficient certainty where the alleged accident occurred.


~~Attorney~~ for Defendant, Joyce Morley

FILED

MAR 21 1963

ALICE L. DUCK, CLERK
REGISTER

HUGH HARTLEY, SR.,
Plaintiff,

VS.

JOYCE MORLEY and W. A.
MORLEY,

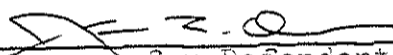
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5260

DEMURRER

Now comes the defendant, W. A. Morley, and demurs to the complaint heretofore filed in said cause and to each count thereof separately and severally and as grounds for said demurrer assign the following separately and severally:

1. The said count does not state a cause of action.
2. It is not described as sufficient certainty where the alleged accident occurred.


Attorney for Defendant, W. A. Morley

FILED
MAY 17 1962
ALICE J. DUCK, CLERK
REGISTER

Hugh Hartley, Jr.	}	In the Circuit
Plaintiff.		Court of
vs	}	Baldwin County,
Joyce Monley et al.		Alabama
Defendants		at Law

Comes plaintiff, with leave of Court first had and obtained, and amends his Complaint, by adding the words "Alice Thomas H. Hartley" in the Caption of said Complaint immediately following the name "Hugh Hartley, Jr." and in said Complaint wherever said name appears.

E. M. Ford Jr.

Jake

Filed 9-10-63

Wesley French
Clerk

Attorney for Plaintiff

HUGH HARTLEY, SR.,

Plaintiff,

VS.

JOYCE MORLEY and W. A. MORLEY,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5260

PLEA

Now come the Defendants in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof separately and severally say, separately and severally:

1. Not guilty.

J. B. BLACKBURN and JAMES R. OWEN

By

J. B. Blackburn
Attorneys for Defendant

*Filed 4-10-63
Miss J. J. J. J.
Curt*

We the jury find
for the defendant
Jesse White

William C. Dwyer
James