

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Damon L. Fuqua 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 same, then and there to answer the complaint of Carroll R. Jones.

Witness my hand on this the 24 day of October, 1962.

Alice J. Duck
Clerk

CARROLL R. JONES,

Plaintiff,

vs.

DAMON L. FUQUA,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) for that on, to-wit: May 5, 1962, at a point on Highway #180 near Fuqua Cottages at Gulf Shores, Baldwin County, Alabama, the Defendant negligently drove an automobile into or against an automobile belonging to the Plaintiff and as a proximate result of the negligence of such Defendant the Plaintiff's automobile was damaged in this: destroyed the deck lid over the trunk of the automobile, seriously damaged the rear bumpers, seriously damaged the gasoline tank, damaged the frame of the automobile and damaged the tail lights, all to the damage of the Plaintiff in the above mentioned sum, hence this suit.

FILED

OCT 24 1962

ALICE J. DUCK, CLERK
REGISTER

Damon L. Fuqua
Attorneys for Plaintiff

5344

CARROLL R. JONES,

Plaintiff,

vs.

DAMON L. FUQUA,

Defendant

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

* * * * *

FILED

OCT 24 1942

ALICE L. DUCK, CLERK
REGISTER

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

Received 23 day of Oct 1942

and on 27 day of Oct 1942

I served a copy of the within

on Damon L. Fuqua

By service on _____

TAYLOR WILKINS, Sheriff

By [Signature] D. S.

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

CARROLL R. JONES,

Plaintiff,

vs.

DAMON L. FUQUA,

Defendant.

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IN THE CIRCUIT COURT OF

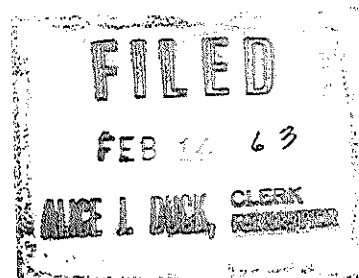
BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Plaintiff in the above styled cause and demurs to plea "2" filed by the Defendant in said cause, and assigns the following separate and several grounds, viz:

1. That said plea is vague and indefinite.
2. That said plea is not a proper plea of contributory negligence.
3. That said plea does not allege that the Plaintiff had stopped his vehicle contrary to the laws of the State of Alabama.
4. That said plea does not allege that the Plaintiff knew or should have known that the Defendant was in close proximity at the time he stopped or backed his automobile.
5. That said plea attempts to set out what the negligence of the Plaintiff consisted of without alleging sufficient negligence on the part of the Plaintiff.


Attorneys for Plaintiff



5344

CARROLL R. JONES,
Plaintiff,

vs

DAMON L. FUQUA,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. _____

DEMURRER TO PLEA 2

FILED
FEB 14 63
ALICE L. DUK, CLERK
REGISTERED

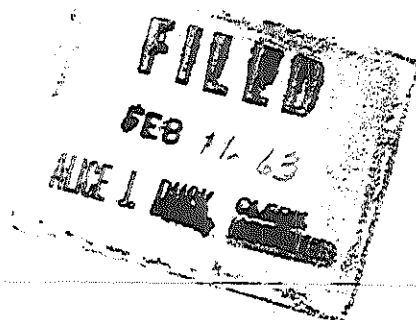
CARROLL R. JONES,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
vs)	BALDWIN COUNTY, ALABAMA
)	
DAMON L. FUGUA,)	AT LAW
)	
Defendant.)	5344

ANSWER

Comes the Defendant in the above styled cause and in answer to the Bill of Complaint heretofore filed therein shows as follows:

1. That he is not guilty.
2. That the Plaintiff was guilty of negligence which proximately contributed to the damage complained of in that he stopped his vehicle on a public road, or that he was backing his vehicle on the public road, all at the time and place as alleged in the complaint, notwithstanding that he knew or should have known that the Defendant was approaching from his rear, and all constituting negligence on the part of the plaintiff.


 Attorney for Defendant



CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

July 2, 1963

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

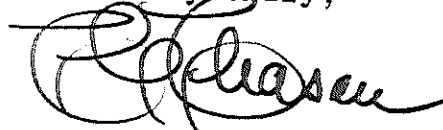
5344

Dear Mrs. Duck:

Re: Carroll R. Jones vs
Damon L. Fuqua

I believe we will be able to compromise the
above styled case, therefore request that you send
me a statement of the amount of court cost to date.

Yours very truly,



C. G. Chason

CGC:dc

cc: Mr. John Chason
Chason & Stone
Attorneys at Law
Bay Minette, Alabama