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Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Ala.

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JOHN V. DUCK
Attorney at Law
FAIRHOPE, ALABAMA

SUBJECT:

Watson-Sanks

DATE:

1/21/63

Message - Reply

FOLD A

THIS IS NCR (NO CARBON REQUIRED) PAPER.

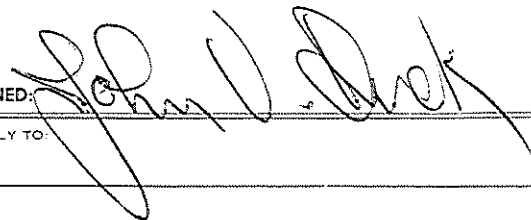
{ JUST TYPE (OR WRITE) ON ORIGINAL. YOUR IMPRESSION
WILL AUTOMATICALLY APPEAR ON COPIES BENEATH.Form 117 - New England Business Service, Inc., Townsend, Mass.

Dear Mrs. Alice:

Enclosed you will find answer's to the interrogatories.
Please file.

JVD:oq
Encl.

SIGNED:



DATE OF REPLY:

REPLY TO:

SIGNED:

SENDER: MAIL RECIPIENT WHITE AND PINK SHEETS

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|-----------------------|---|-------------------------|
| BARBARA WILLIAMS | X | |
| Plaintiff | X | IN THE CIRCUIT COURT OF |
| vs | X | BALDWIN COUNTY, ALABAMA |
| GEORGE SULLIVAN SANKS | X | AT LAW |
| Defendant | X | |

Comes the defendant in the above styled cause and propounds the following interrogatories to the plaintiff, Barbara Williams:

1. State your name.
2. Are you the plaintiff in this cause, No. 5393?
3. Where do you live?
4. Give the location on the highway of Route 4, Atmore, Alabama, where your house is located and identify the highway.
5. At the time of the accident alleged in your complaint where were you going?
6. State the name of the owner of the vehicle in which you were riding.
7. State the name of the driver of the vehicle in which you were riding.
8. Are you related to the driver of the vehicle?
9. How long had you known the driver of the vehicle?
10. Give the present address of the driver of the vehicle.
11. Were you employed at the time of the accident?
12. If you were employed, state where you were employed and how long you had worked there.
13. If the driver is not the owner of the vehicle, state whether you asked the driver to operate the car for you or the driver invited you to go with him.
14. Did you give the driver of the vehicle involved in this accident any instructions whatever?
 - a. If so, state what instructions you gave the driver.

THOMPSON & WHITE

BY:

C. LeNoir Thompson
Attorneys for defendant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am one of the Attorneys of Record for the defendant in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the plaintiff to the foregoing interrogatories will, if truthfully made, be material evidence for the defendant on the trial of said cause.

C. LeNoir Thompson
C. LENOIR THOMPSON

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 20th day of December, 1962.

Mary Thompson White
Notary Public *State at Large*

FILED

DEC 20 1962

ALICE J. DUCK, CLERK

REGISTER

BARBARA WILLIAMS
Plaintiff'

-VS-

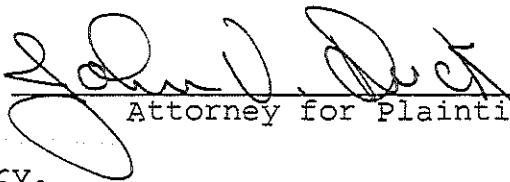
GEORGE SULLIVAN SANKS

)
) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA.
)
)
) AT LAW.
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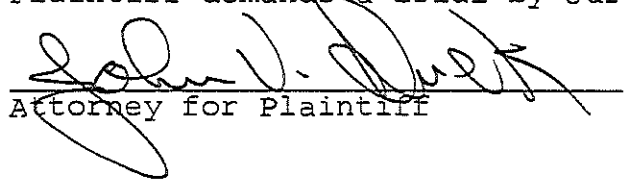
BILL OF COMPLAINT

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS, as damages, for that, on to-wit: The 12th day of December, 1961, at or about 5:15 P.M. at the intersection of U. S. Highway 31 and Baldwin County Road Number 61, in Baldwin County, ALABAMA, the Defendant so negligently operated a motor vehicle as to cause or allow it to collide with the motor vehicle in which the plaintiff was riding and as the proximate result of the negligence of such defendant the plaintiff was injured in that she suffered three broken ribs, her legs were badly bruised, she suffered multiple contusions and abrasions, that she was caused to expend great sums of money in and about the treatment of her injuries, that she was made otherwise sick, lame and sore, that she suffered great mental pain and anguish, that she continues to suffer great pain and anguish and will in the future be caused to spend great sums of money for the future treatment of her injuries, all as a result of the negligence of said defendant; all to the damage of the plaintiff in the above mentioned sum, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by Jury.


Attorney for Plaintiff

Defendant may be served at:

Rt. 2, Bay Minette, Ala.

FILED

DEC 4 1962

ALICE L. DUCK, CLERK

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SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GEORGE SULLIVAN SANKS

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 _____

GEORGE SULLIVAN SANKS, Defendant

by BARBARA WILLIAMS

_____, Plaintiff

Witness my hand this 4 day of Dec 1962

Barbara Williams, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

BARBARA WILLIAMS

vs.

Plaintiffs

GEORGE SULLIVAN SANKS

Defendants

SUMMONS and COMPLAINT

Filed

FILED

, 19

DEC 4 1962

, Clerk

ALICE J. DUCK, ~~CLERK~~

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt. 2 Bay Minette,
Alabama

RECEIVED IN OFFICE

12/4, 1962

, Sheriff

I have executed this summons

this Dec- 8, 1962

by leaving a copy with

George Sullivan SanksSheriff claims 20 miles atTen Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. A. Zeller Deputy Sheriff10 miles north of B.M.

| | | |
|-----------------------|---|-------------------------|
| BARBARA WILLIAMS | X | |
| Plaintiff | X | IN THE CIRCUIT COURT OF |
| vs | X | BALDWIN COUNTY, ALABAMA |
| GEORGE SULLIVAN SANKS | X | AT LAW. NO. 5393 |
| Defendant | X | |

Comes the defendant, George Sullivan Sanks, and for answer to the complaint filed in said cause shows unto this Honorable Court as follows:

-1-

As to the allegations of said complaint, he pleads not guilty.

-2-

Comes defendant, George Sullivan Sanks, and says that the said Barbara Williams, plaintiff in said cause ought not to recover in this case for that on the occasion complained of, Jerry Joseph Williams, the agent, servant or employee of said plaintiff was himself guilty of negligence proximately contributing to the injuries of said plaintiff and damages, in this, that the said Jerry Joseph Williams, agent, servant or employee of said plaintiff was operating the said automobile in which said plaintiff was riding on U. S. Highway numbered 31 and negligently drove his said automobile across the center line of U. S. Highway numbered 31 toward the left side of said highway so that the said automobile driven by the agent, servant or employee of the said plaintiff collided with the automobile operated by the defendant while the said defendant's automobile was on the right side of the said center line, where said defendant had a legal right to be; totally wrecking the automobile operated by the said defendant. Said negligence of the agent, servant or employee of the said plaintiff proximately contributed to the said plaintiff's injuries and damages. Hence, the said plaintiff ought not to recover in this suit.

-3-

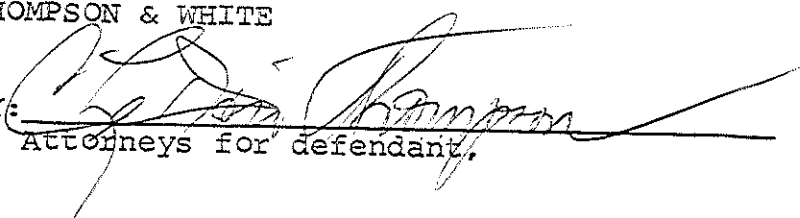
Comes defendant, George Sullivan Sanks and says that at the time this action was commenced, the plaintiff was indebted to him in the sum of \$1,000.00, for that on to-wit, December 12, 1961, at or about 5:15 P.M. at the intersection of U. S. Highway numbered 31 and Baldwin County road No. 61 in Baldwin County, Alabama, one Jerry Joseph Williams, the agent, servant or employee of said plaintiff, while operating an automobile negligently ran said automobile across the center line of said U. S. Highway

numbered 31, and into, upon or against the automobile, property of said defendant, George Sullivan Sanks and thereby as the proximate result and consequence thereof the said defendant's automobile was broken, damaged, rendered less valuable, to the defendant's damage as assessed, which defendant hereby offers to set off against the demand of the plaintiff and he claims for the excess.

-4-

Comes the defendant, George Sullivan Sanks, and claims of the plaintiff, Barbara Williams, by way of recoupment, the sum of \$1,000.00 damages for that heretofore on to-wit, December 12, 1961, at the intersection of U. S. Highway, a public highway, numbered 31 and Baldwin County road No. 61, in Baldwin County, Alabama, at about 5:15 P.M. and the place referred to in plaintiff's complaint, one, Jerry Joseph Williams, the agent, servant or employee of the said plaintiff negligently drove an automobile across the center line of said highway into, upon or against the automobile of the said defendant, George Sullivan Sanks, and as a proximate result and consequence of said negligence, said automobile was damaged as follows, to-wit, being a total loss.

THOMPSON & WHITE

BY: 
Attorneys for defendant.

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ALICE I. DUCK, CLERK
REGISTER