

ANNA SALAC,)	
)	IN THE CIRCUIT COURT OF BALDWIN
Plaintiff,)	
)	COUNTY, ALABAMA
VS.)	
)	AT LAW
LLOYD CLAY,)	
)	NO. 5426
Defendant.)	

ANSWER TO COMPLAINT

Comes now the Defendant in the above styled cause and for answer to the Complaint therein, and to each count thereof, separately and severally, makes and files the following separate and several pleas:

1. Not guilty.
2. Defendant denies the material allegations thereof.
3. Defendant pleads in short by consent the general issue, with leave to offer evidence with respect to matters which would constitute a defense if specially pleaded, and to rely upon such defenses.
4. At the time and place of the matters and things complained of the automobile in which the Plaintiff was riding was being driven by an agent or servant of the Plaintiff while acting within the line and scope of his employment as such, and that such driver was negligent in and about the operation of said automobile, which negligence proximately contributed to the injuries and damages complained of, wherefore the Plaintiff ought not to recover.

INGE, TWITTY & DUFFY

By J. E. Twitty

Attorneys for Defendant

FILED
 Jan 25-42
 ALICE I. DUCK, CLERK
 REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LLOYD CLAY 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 ANNA SALAC.

WITNESS my hand this 11 day of January, 1963.

Defendant resides at
311 North Summit Street,
Fairhope, Alabama

Deane J. ...
Clerk of the Circuit Court

* * * * *

ANNA SALAC,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
LLOYD CLAY,)	AT LAW NO. _____
Defendant.)	

COMPLAINT

The plaintiff claims of the defendant the sum of Ten Thousand and Dollars (\$10,000.00) as damages for that heretofore on, to-wit, January 22, 1962, the defendant so negligently operated the motor vehicle which he was then and there driving on a paved county road between the Busy B. Garage and Klumpp Airport, which was approximately one and one-half miles east of the Greeno Road in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against an automobile in which the plaintiff was then and there riding as a passenger, and as a proximate result of the negligence of the defendant as aforesaid, the plaintiff's head was injured, she was caused to suffer mental and physical pain and anguish, she was caused to incur doctor bills, hospital bills and

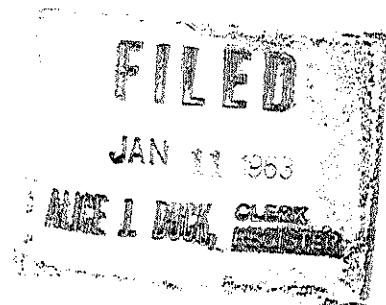
other medical bills because of the said injuries, hence this suit.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of
said cause by jury.

J. B. Blackburn
Attorney for Plaintiff

Ed - 1-14-63



SUMMONS AND COMPLAINT

ANNA SALAC,

Plaintiff,

VS.

LLOYD CLAY,

Defendant.

Received 11 day of Jan. 1931
and on 14th day of Jan. 1931
I am a copy of the writ
on Lloyd Clay

By service on

TAYLOR WILKINS, Sheriff

Fred Gilbert
F. Gilbert

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

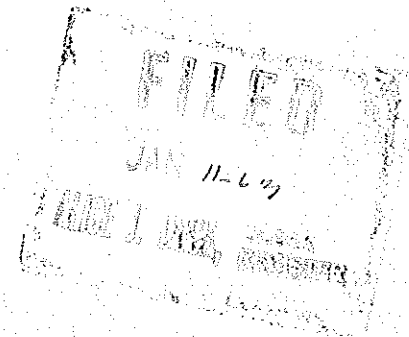
TAYLOR WILKINS, Sheriff

BY Gilbert
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 54216



J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA