

MARY ANN SCHUH,)	IN THE CIRCUIT COURT OF BALDWIN
Plaintiff,)	COUNTY, ALABAMA
VS.)	AT LAW
LLOYD CLAY,)	
Defendant.)	NO. 5427

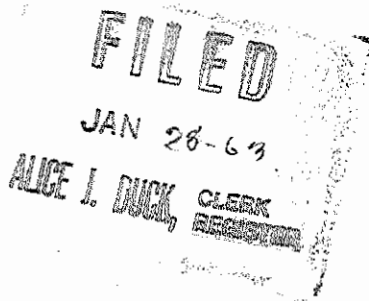
ANSWER TO COMPLAINT

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 *H. E. Twitty*
Attorneys for Defendant



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 MARY ANN SCHUH.

WITNESS my hand this 11 day of January, 1962.

Alfred L. Davis Jr
Clerk of the Circuit Court

Defendant resides at
311 North Summit Street,
Fairhope, Alabama

* * * * *

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

COMPLAINT

The plaintiff claims of the defendant the sum of Three Thousand Dollars (\$3,000.00) 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 the plaintiff's head was injured, her forehead was cut and bruised, her left leg was cut and bruised, she

she was caused to suffer severe pain and agony, she was caused to incur doctor 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



5427

SUMMONS AND COMPLAINT

MARY ANN SCHUH,

Plaintiff,

VS.

LLOYD CLAY,

Defendant.

Served 14th day of Jan 1963
d on 14th day of Jan 1963
served a copy of the within Lloyd Clay

service on

TAYLOR WILKINS, Sheriff

By Fred L. Lister
Thyze

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Deputy
DEPUTY SHERIFF

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

FILED
JAN 11-63
ALICE J. DUCK, CLERK
REGISTER

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

INGE, TWITTY & DUFFY
LAWYERS

THOS. E. TWITTY
FRANCIS H. INGE (1902-1959)
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III

MERCHANTS NATIONAL BANK BUILDING
MOBILE, ALABAMA

MAILING ADDRESS:
P. O. BOX 1109
MOBILE, ALA.

CABLE ADDRESS:
TWINING
TELEPHONE:
HEMLOCK 3-5441

January 25, 1963

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

5427

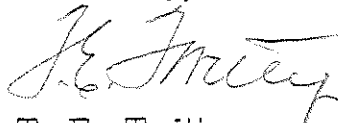
Dear Mrs. Duck:

We are enclosing, in duplicate, for filing an answer in each one of the cases of Charles Schuh, Mary Ann Schuh, and Anna Salac versus Lloyd Clay, Nos. _____, 5427 and 5426, respectively.

By copy of this letter we are informing Mr. Blackburn of the filing of these answers and request that on his next trip to Mobile, if convenient with him, he drop by the office and discuss the cases with me.

With kindest regards, I am

Cordially,



T. E. Twitty

For the Firm

TET/d
Encls.

cc: Mr. J. B. Blackburn
Attorney at Law
Bay Minette, Alabama