CHARLES SCHUH,)	IN THE CIRCUIT COURT OF BALDWIN
Plaintiff,)	
VS.)	COUNTY, ALABAMA
LLOYD CLAY,)	AT LAW
Defendant.)	NO. 15 4 25

ANSWER TO COMPLAINT

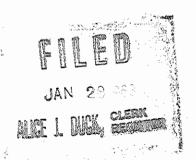
Comes now the Defendant in the above styled cause and for answer to the Complaint therein, and to each count thereof, separately and severally, makes and files the following separate and several pleas:

- 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. Defendant says that the Plaintiff was negligent in and about the operation of the automobile which he was driving at the time and place of the matters and things complained of and that such negligence of the Plaintiff proximately contributed to the injuries and damages complained of, wherefore the Plaintiff ought not to recover.

INGE, TWITTY & DUFFY

By <u>JEJAN</u>E

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 CHARLES SCHUH.

WITNESS my hand this __// day of January, 1963.

Okic J. Duek Clerk of the Circuit Court

Defendant resides at 311 North Summit Street, Fairhope, Alabama

* * * * * * * * * * * *

CHARLES SCHUH,

Plaintiff,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LLOYD CLAY,

Defendant.

Defendant.

COMPLAINT

The plaintiff claims of the defendant the sum of Three
Thousand Dollars (\$3,000.00) as damages for that heretofore on, towit, 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 the automobile which the plaintiff was then
and there driving and, as a proximate result of the negligence of
the defendant as aforesaid, the plaintiff's little finger on his
left hand was cut, his ribs were bruised, his knees were bruised,

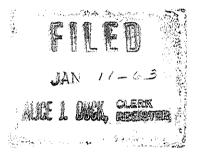
he was caused to suffer severe pain and agony, he was caused to incur doctor bills and medical bills because of the said injuries, hence this suit.

Starleterm

Attorney for Plaintiff

Plaintiff demands a trial of said cause by jury.

Attorney for Plaintiff



EN-1-14-63

leceived day of 19 day of

SUMMONS AND COMPLAINT
CHARLES SCHUH,
Plaintiff,

VS.

LLOYD CLAY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 54 24 5

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