

MARVIN HENRY IHENEN,
Plaintiff
V.
E. S. ROBINSON, and
CAROLYN SUE ROBINSON, a
minor,
Defendants

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

5004

COUNT ONE

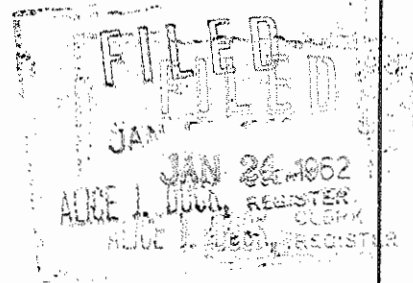
Plaintiff claims of the Defendants the sum of ONE-
HUNDRED FIFTY (\$150.00) DOLLARS for damages for that, on, to-wit:
the 27th day of August, 1961, the Defendant E. S. ROBINSON, acting
by and through his agent, servant or employee, CAROLYN SUE ROBIN-
SON, who was then and there acting within the line and scope of
her authorities, such agent, servant or employee, so negligently
drove a motor vehicle on Baldwin County Highway No. 2, at a point
seventy-five (75) feet from Cabin No. 19, of Lakeside Cabins of
Gulf State Park, in Baldwin County, Alabama, as to cause or allow
such motor vehicle to run into or against plaintiff's motor vehi-
cle, and as a proximate result of the negligence of such defendants,
plaintiff's automobile was damaged in that the right rear quarter
panel of Plaintiff's vehicle was bent, torn and badly twisted, all
to the damage of the Plaintiff in the above mentioned sum, hence
this suit.

John V. Duck

Attorney for Plaintiff

Defendant may be served

Route 6, Box 188-A, Bessemer, Ala.



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 E. S. ROBINSON, and CAROLYN SUE ROBINSON,

A MINOR

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 E. S. ROBINSON, and

CAROLYN SUE ROBINSON, a Minor

_____, Defendant_____

by MARVIN HENRY TENEN

_____, Plaintiff_____

Witness my hand this

24

day of

Jan

1962

Beirf-Weck, Clerk

Exp-2-11-62

No. 5004

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MARVIN HENRY IHLEN

vs.

Plaintiffs

E. S. ROBINSON, and CAROLYN

SUE ROBINSON, a Minor

Defendants

SUMMONS and COMPLAINT

Filed

FILED

19

JAN 24 1962

Clerk

ALICE J. DUCK, CLERK
REGISTER

Rt 6, Box 188 A

Concord

5th house on
Lili's Lane

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
May be served at:
Route 6, Box 188-A
Bessemer, Alabama

RECEIVED IN OFFICE

Jan 24, 1962

Sheriff

I have executed this summons

this FEB 11 1962, 19

by leaving a copy with

E. S. Robinson.

Further executed by
leaving a copy with
Carolyn Sue Robinson, a minor
in presence of E. S. Robinson,
father.

HOLT A. McDOWELL, Sheriff

McAlpine & Hubbard D.S.

Holt A. McDowell, Sheriff of Jef-
ferson County, Alabama, Bessemer
Division, claims \$1.50 cash for
serving 2 process(es) and
\$1.00 travel expense on each.

\$5.00

McAlpine & Hubbard Deputy Sheriff,

Sheriff

Deputy Sheriff

325

Bess

MARVIN HENRY IHNEN,	X	
Plaintiff,	X	
vs.	X	IN THE CIRCUIT COURT OF
	X	BALDWIN COUNTY, ALABAMA
E. S. ROBINSON and	X	AT LAW
CAROLYN SUE ROBINSON,	X	NO. 5004
a minor,	X	
Defendant.	X	

PLEA:

Come now the Defendants in the above styled cause and for answer to the complaint heretofore filed in said cause plead separately and severally as follows:

1. Not guilty.

2. That the Plaintiff was guilty of negligence at the time and place complained of in his complaint which proximately contributed to his alleged damages in that the Plaintiff so negligently operated his motor vehicle as to cause or allow the same to run into, upon or against the automobile which was then and there being driven by the Defendant, Carolyn Sue Robinson, a minor, hence he should not recover.

3. For further plea and by way of recoupment the Defendant, E. S. Robinson, claims of the Plaintiff the sum of One Hundred and Seventy-five Dollars (\$175.00) as damages for that heretofore, on to-wit: August 27, 1961 on Baldwin County Highway Number 2, at a point seventy-five feet from Cabin No. 19, of Lake Side Cabins, of Gulf State Park, in Baldwin County, Alabama, the Plaintiff so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle driven by the Defendant, Carolyn Sue Robinson, a minor, and as a proximate result of such negligence, the automobile of the Defendant, E. S. Robinson, was damaged in this: the front bumper and grill were bent, damaged and broken; the right front headlamp was bent, damaged and broken; the right front fender was bent, damaged and broken; the front wheels were knocked out of line, all to the damage of the said Defendant in the above sum.

FILED

FEB 22 1962

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE

234

By:

John Earle Chason
Attorneys for Defendants

PLEA:

* * * * *

MARVIN HENRY IHNEN,

Plaintiff,

vs.

E. S. ROBINSON and
CAROLYN SUE ROBINSON,
a minor,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5004

* * * * *

FILED

FEB 22 1962

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA