

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Alexander Clark, Jr.
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 John Curlee.

WITNESS MY HAND, this 1st day of April, 1963.

Oliver J. Luck
Clerk

Defendants Address:
P. O. Box 766, Fairhope, Ala.

* * * * *

5527

JOHN CURLEE,
Plaintiff,
VS.
ALEXANDER CLARK, JR.
Defendant.

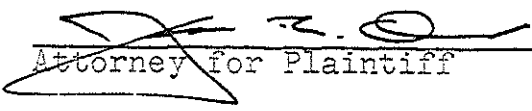
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT

COUNT ONE

The plaintiff claims of the defendant the sum of Seven
Hundred Fifty Dollars (\$750.00) for that heretofore on to-wit:
October 5, 1962, at a point on Twin Beach Road, near Fairhope,
Baldwin County, Alabama, the defendant so negligently operated
an automobile so as to cause it to run into, upon or against the
automobile of plaintiff, which the plaintiff was then and there
operating on said Twin Beach Road, which is a public road and where
he had a right to be, and as a proximate result of the negligence
of the said defendant, plaintiff's automobile was bent, broken and
damaged; the complete front end was bent and damaged and the left
side from front to back was bent and damaged, causing a total loss

of plaintiff's automobile. Plaintiff avers that all of his damages were the direct result of the negligence of the defendant, hence this suit.


~~Attorney for Plaintiff~~

64-4-10-63

FILED

APR 1 1963

ALICE J. DUCK, CLERK
REGISTER

5527

John Carlee

Pitt.

vs.

Alexander Clark, Jr.

Deft.

FILED

APR 1 1903

ALICE J. DICK, CLERK
REGISTER

James R. Owens

Received 1 day of April 1903

and on 10th day of April 1903

served a copy of the within Stc

in Alexander Clark, Jr.

By service on _____

TAYLOR WILKINS, Sheriff

By Taylor Wilkins D.

Taylor

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

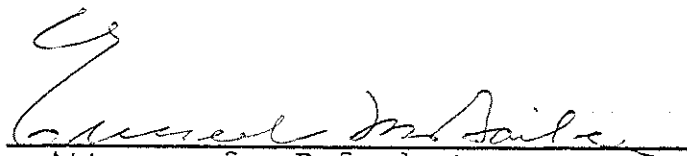
BY _____
DEPUTY SHERIFF

JOHN CURLEE,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
-vs-	)	BALDWIN COUNTY, ALABAMA
ALEXANDER CLARK, JR.,	)	AT LAW
Defendant.	)	CASE NO. <u>5627</u>

DEMURRER

Comes the Defendant in the above styled cause and demurs to the Bill of Complaint filed in said cause and assigns the following separate grounds, separately and severally, viz:

1. The Bill of Complaint does not state a cause of action.
2. The allegations of the Bill of Complaint are vague and indefinite.
3. The allegations of the Bill of Complaint are vague and indefinite in that it is not alleged at what point on Twin Beach Road the accident occurred.
4. The allegations of the Bill of Complaint are conclusions of the pleader.


 Attorney for Defendant

FILED

MAY 3 1963

ALICE J. DUCK, CLERK
REGISTER

705327

JOHN CURLEE,

Plaintiff

-vs-

ALEXANDER CLARK, JR.,

Defendant

JOHN CURLEE,

Plaintiff,

VS.

ALEXANDER CLARK, JR.

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

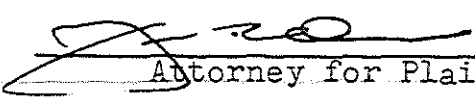
AT LAW

AMENDED COMPLAINT

Now comes the Plaintiff in the above styled cause and amends the complaint heretofore filed in said cause so that as amended the said complaint will read as follows:

"COUNT ONE

The Plaintiff claims of the Defendant the sum of Seven Hundred Fifty Dollars (\$750.00) for that heretofore on to-wit, October 5, 1962, at a point on Twin Beach Road .6 miles South of the city limits of Fairhope, Alabama, and 50 feet West of power pole number 6 in Baldwin County, Alabama, the Defendant so negligently operated an automobile so as to cause it to run into, upon or against the automobile of plaintiff, which the plaintiff was then and there operating on said Twin Beach Road, which is a public road and where he had a right to be, and as a proximate result of the negligence of the said defendant, plaintiff's automobile was bent, broken and damaged; the complete front end was bent and damaged and the left side from front to back was bent and damaged, causing a total loss of plaintiff's automobile. Plaintiff avers that all of his damages were the direct result of the negligence of the defendant, hence this suit."


Attorney for Plaintiff

FILED

SEP 13 1963

ALICE J. BUCK, CLERK
REGISTER