

Defendant

CASE NO. 5586

58

TEMPLE GRAHAM,
Plaintiff,
VS.
W. F. HAWIE,
Defendant.

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) AT LAW
)
)
) CASE NO. 5586

ANSWER

Comes now W. F. HAWIE, the Defendant in the above entitled cause, and for answer to complaint Plaintiff heretofore filed herein, sets down and assigns, separately and severally, the following pleas:

ONE

Not guilty.

TWO

At the time and place complained of in the complaint, Plaintiff was himself guilty of negligence which proximately contributed to his injuries and damages complained of; wherefore Plaintiff ought not recover.

Delano J. Paluchi
DELANO J. PALUCHI, Attorney for the
Defendant

FILED

JUL 1 1963

ALICE L. DUCK, CLERK
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. F. HAWIE 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 TEMPLE GRAHAM.

WITNESS my hand this 30 day of May, 1963.

Alice J. Luck
Clerk of the Circuit Court

Defendant resides at
Fairhope, Alabama.

* * * * *

TEMPLE GRAHAM,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
W. F. HAWIE,)	AT LAW NO. <u>5586</u>
Defendant.)	

COMPLAINT

The plaintiff claims of the defendant the sum of FIVE HUNDRED DOLLARS (\$500.00) as damages for that heretofore on, to-wit, June 2, 1962, the defendant so negligently operated the motor vehicle which he was then and there driving on Fairhope Avenue in Fairhope, Baldwin County, Alabama, at a point at or near the plaintiff's residence at 121 Fairhope Avenue, as to cause or allow the said motor vehicle to run into, upon or against plaintiff's automobile, and as a proximate result of the negligence of the defendant as aforesaid, the frame on the plaintiff's automobile was bent and otherwise damaged, all as a proximate result of the negligence

of the defendant as aforesaid.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of this
said cause by jury.

J. B. Blackburn
Attorney for Plaintiff

FILED

MAY 30 1963

ALICE I. DUCK, CLERK
REGISTER

EX-68-62

TEMPLE GRAHAM,

Plaintiff,

VS.

W. F. HAWIE,

Defendant.

Received 30 day of May 1963
and on 8th day of June 1963
I served a copy of the within D & C
on W. F. Hawie

By service on _____

TAYLOR WILKINS, Sheriff
By Ted Feibel D. 3
Thore

Sheriff claims 140 miles at
Ten Cents per mile Total \$ 14.00
TAYLOR WILKINS, Sheriff
BY _____ DEPUTY SHERIFF

I James E. Wiggins
in the name of
the Defendant \$300.00

We, the Jury find for
the Plaintiff and
assess her damages
at \$300.00
James E. Wiggins
Foreman

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5586

FILED

MAY 30 1963

ALICE J. DUCK, CLERK
REGISTER

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