LUCIA C. ANDRESS,

IN THE CIRCUIT COURT OF

Plaintiff

BALDWIN COUNTY, ALABAMA

VS.

PRITCHETT LOFTIN,

AT LAW.

Defendant.

CASE NO. (563 %

Plaintiff claims of the Defendant the sum of TWENTY THOUSAND AND NO/100 (\$20,000.00) DOLLARS as damages, for that heretofore on, to-wit, June 19, 1963 while the Plaintiff was operating her automobile on U. S. Highway 98, a public highway in Baldwin County, Alabama near Daphne, Alabama the Defendant so negligently operated his automobile so as to cause the said to collide with the automobile being driven by the Plaintiff and as a proximate consequence thereof Plaintiff was injured and damages as follows: Plaintiff suffered severe lacerations about the face and body; Plaintiff was severally bruised; Plaintiff was caused to undergo surgical treatment; Plaintiff suffered severe intestinal injuries. Plaintiff was caused to spend money on doctors bills, medical bills, drug bills; Plaintiff was caused to lose time from her work; Plaintiff suffered permanent scars; Plaintiff suffered severe physical pain and mental anguish.

And Plaintiff avers that all her said injuries and damages were caused as a proximate result of the negligence of the Defendant in and about the operation of said motor vehicle at said time and place.

J.M. MATRANGA

ATTORNEY FOR PLAINTIFF

Plaintiff demands trial by jury

Defendant can be served at: Pritchett Loftin, 473 Wellington Street, Mobile, Alabama

LUCIA C. ANDRESS,	)
Plaintiff,	) IN THE CIRCUIT COURT OF
vs.	) BALDWIN COUNTY, ALABAMA
PRITCHETT LOFTIN, Defendant.	) ) AT LAW CASE NO. 5638

Now comes the Defendant in the above styled cause and demurs to the Complaint in said cause and as grounds therefor assigns, separately and severally, the following separate and several grounds:

- 1. For that the Complaint fails to state a cause of action.
- 2. From aught that appears the **Defe**ndant was under no duty to the Plaintiff at the time and place complained of in the Complaint.
- 3. From aught that appears the Defendant has breached no duty which he owed to the Plaintiff at the time and place complained of in the Complaint.
- 4. From aught that appears the Defendant was not operating his automobile on a public highway at the time of the accident complained of in the Complaint.
- 5. For that the Defendant is not sufficiently advised as to the place where the accident complained of in the Complaint occurred.
- 6. For that the Complaint is vague, uncertain and indefinite.

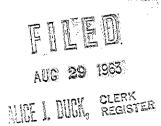
McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

BY .

Attorneys for Defendant

P. 0. Box 1070

Mobile, Alabama



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BALDWIN COUNTY

No.	5638		
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CIRCUIT COURT, BALDWIN COUNTY

TO	ANY	SHERIFF	OF	THE	STATE	$\mathbf{OF}$	ALABAMA:

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Prito	chett Loftin			, Defendant
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	C. Andress			
Lucia	U. Andress			
				, Plaintiff
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Plainti	ff's Attorney	Roy D.	Budg	Sherifi
Defendant	's Attorney		De	eputy Sherifi