

HADEN L. PITTS,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	
STELLA P. DAVIDSON and	I	BALDWIN COUNTY, ALABAMA
T. J. DAVIDSON, SR.,	I	
Defendants.	I	AT LAW.
	I	5962

COUNT ONE:

The Plaintiff claims of the Defendants the sum of FIFTY THOUSAND AND NO/100 DOLLARS (\$50,000.00) as damages, for that, heretofore, on, to-wit, the 7th day of September, 1963, at about 3:30 o'clock P. M., in the City of Bay Minette, Alabama, on United States Highway Number 31, at a point approximately in front of the National Guard Armory, which is a public road or highway in Baldwin County, Alabama, the Defendant, Stella P. Davidson, who was then and there an agent, servant or employee of the Defendant, T. J. Davidson, Sr., acting within the line and scope of her employment as such, did so negligently operate an automobile, which she was then and there driving, as to cause, permit or allow the said automobile to collide with, run into, upon or against a motor scooter which the Plaintiff was then and there riding, and as a proximate result and consequence of the negligence of the said Defendant, Stella P. Davidson, as aforesaid, the Plaintiff suffered injuries as follows: His right zygoma and right inferior orbital rim were fractured; he suffered a compound fracture of the right femur; he was permanently injured; he was made sick, sore and lame; his right leg was permanently injured; he suffered permanent injuries and scars to the right side of his face and jaw; he suffered contusions and abrasions in and about his legs, knee, body and head; he was caused to suffer great physical pain and mental anguish and is still suffering great physical pain and mental anguish because of his injuries; he was caused to expend great sums of money for medical, hospital, doctor and nurse care in and about the treatment of his said injuries; he was caused to lose much time from his work; his

motor scooter was rendered a total loss; all to the damage of the Plaintiff in the amount hereinabove stated; hence this suit.

MASHBURN AND OWENS

By: Jeffrey G. Mashburn
Attorneys for Plaintiff.

The Plaintiff demands a trial
of this cause by Jury.

MASHBURN AND OWENS

By: Jeffrey G. Mashburn
Attorneys for Plaintiff.

FILED

JAN 24 1904

CLERK
REGISTER

HADEN L. PITTS,

Plaintiff,

VS.

STELLA P. DAVIDSON and
T. J. DAVIDSON, SR.,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


AT LAW

NO. 5902

DEMURRER

Now come the defendants in the above styled cause and demur to the complaint heretofore filed in said cause and as grounds therefor assign the following separately and severally:

1. It does not state a cause of action.


Attorney for Defendants

FILED

MAY 11 1964

Alice J. Duck, CLERK
REGISTER

HADEN L. PITTS,

Plaintiff,

vs.

STELLA P. DAVIDSON and
T. J. DAVIDSON, SR.,

Defendants.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA

:

: AT LAW

:

CASE NO. 5902

:

Come the Defendants in the above-styled cause,
and for answer to the complaint, say:

1. Not Guilty.

JOHNSTON, JOHNSTON & COURTNEY
Attorneys for Defendant.

BY

William E. Johnston
WILLIAM E. JOHNSTON

FILED

APR 24 1934

ALICE L. DICKSON, CLERK
JAMES L. REGISTER

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
DAHLBERG BUILDING
P. O. BOX 253
BAY MINETTE, ALABAMA

March 19, 1965

Mrs. Alice J. Duck
Clerk of Circuit Court
Baldwin County, Alabama
Bay Minette, Alabama

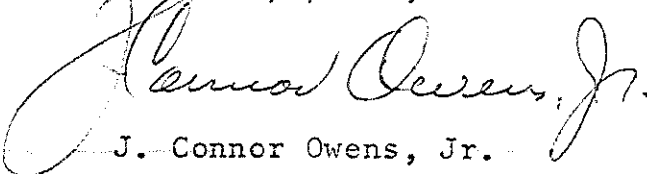
Subject: Haden L. Pitts, Plaintiff,
vs.
Stella P. Davidson & T. J. Davidson, Sr.
Defendants. Number 5902.

Dear Mrs. Duck:

Please dismiss the above styled matter now
pending in the Circuit Court of Baldwin County,
Alabama, Law Side, and forward the cost bill to
me. This case has been settled between the parties.

Thank you for your aid and consideration in
this matter.

Sincerely yours,


J. Connor Owens, Jr.

JCO:am

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5902

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Stella P. Davidson & T.J. Davidson, Sr.

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

Stella P. Davidson & T.J. Davidson, Sr., Defendant

by Haden L. Pitts

, Plaintiff

Witness my hand this 24th day of January 1964

W. L. Black, Clerk

EX-1-21-64

682

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HADEN L. PITTS

vs.

Plaintiffs

STELLA P. DAVIDSON &

T.J. DAVIDSON, SR.

Defendants

SUMMONS and COMPLAINT

Filed Jan. 24, 1964, 19

Alice J. Duck, Clerk

Mashburn & Owen

Plaintiff's Attorney

Defendant's Attorney

RECEIVED IN OFFICE

Jan. 24, 1964

, Sheriff

I have executed this summons

this Jan 31, 1964

by leaving a copy with

Stella P. Davidson
T.J. DavidsonTaylor W. White, Sheriff
D. A. Zeller, Deputy Sheriff