

ROLAND HARRIS, a minor,)	IN THE CIRCUIT COURT OF
suing by and through his next)	BALDWIN COUNTY, ALABAMA
friend and father, MELVIN)	
HARRIS,)	AT LAW
)	
Plaintiff,)	
)	
vs.)	
)	
CONTINENTAL TRAILWAYS BUS)	
COMPANY, INC., a corporation,)	
and LAWRENCE W. THAMES,)	
jointly and severally,)	
)	CASE NO. 6104
Defendants.)	

DEMURRER

Come now Colonial Trailways, Inc., a corporation, which has been improperly designated in the complaint herein as Continental Trailways Bus Company, Inc., a corporation, and Lawrence W. Thames, separately and severally, and demur to the complaint of the plaintiff herein and for grounds of demurrer set down and assign the following, separately and severally, that is to say:

- 1) For that it does not state facts sufficient to constitute a cause of action.
- 2) For that negligence is therein alleged merely as a conclusion of the pleader.
- 3) For that it is vague, indefinite and uncertain, in that it does not apprise this defendant with sufficient certainty against what act or acts of negligence this defendant is called upon to defend.
- 4) For that it does not appear with sufficient certainty what duty, if any, this defendant may have owed to the plaintiff.
- 5) For that it does not appear with sufficient certainty wherein this defendant violated any duty it may have owed to the plaintiff.
- 6) For that it does not sufficiently appear that this defendant owed any duty to the plaintiff which this defendant negligently failed to perform.
- 7) For that there does not appear sufficient causal connection between this defendant's alleged breach of duty and the plaintiff's alleged injuries and damages.

8) For that no facts are alleged therein to show that the plaintiff sustained any damage or injury as the proximate result of any negligence or breach of duty on the part of this defendant.

9) For that it is not alleged with sufficient certainty where said accident occurred.

10) For that it is not alleged that the negligence complained of proximately caused the accident, the injuries and the damages complained of.

11) For that the averments thereof are conflicting and repugnant.

12) For that no causal connection appears between this defendant's alleged negligence and the injuries and damages complained of by the plaintiff.

INGE, TWITTY, DUFFY & PRINCE

By: 
James J. Duffy, Jr. - Designated
Trial Attorney

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 27th day of July, 1964.


Attorney for

REFILED

FEB 12 1965

ALICE J. DUCK, CLERK
REGISTER

REFILED

SEP 4 1964

- ALICE J. DUCK, CLERK
REGISTER

FILED

JUL 28 1964

ALICE J. DUCK, CLERK
REGISTER

ROLAND HARRIS, a minor suing by and
through his next friend and father,
MELVIN HARRIS,

Plaintiff

VS.

CONTINENTAL TRAILWAYS BUS COMPANY, INC.)
a Corporation, and LAWRENCE W. THAMES,)
jointly and severally,)

Defendants)

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

M. 6104

Plaintiff, a minor, who sues by his next friend and
father, MELVIN HARRIS, Claims of the Defendants the sum of TWO
THOUSAND FIVE HUNDRED AND NO/100 DOLLARS (\$2,500.00), as damages
for that heretofore, and on to-wit, the 20th day of September, 1963,
the Defendant, LAWRENCE W. THAMES, as agent, servant or employee
of the Defendant, CONTINENTAL TRAILWAYS BUS COMPANY, INC., and who
was then and there acting within the line and scope of his employ-
ment, so negligently operated a motor vehicle on U. S. Highway No.
31, at the intersection of Malbis Cut-Off, which was then and there
a public highway in Baldwin County, Alabama, so as to allow it to
run into, upon or against the automobile in which Plaintiff's said
minor son was a passenger, and as a proximate result of the negli-
gence of the Defendants, as aforesaid, Plaintiff was injured in
that he suffered lacerations of the scalp, he suffered multiple
contusions and abrasions, and was made otherwise sick, sore and
lame, that he was caused to expend great sums of money in and about
the treatment of his injuries, all as a result of the negligence of
the Defendants as aforesaid; hence, this suit.

John V. Duck
ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands trial by jury.

John V. Duck
ATTORNEY FOR PLAINTIFF

FILED

JUL 10 1964

MADE L. DUCK, CLERK
REGISTER

20 miles
Charlie Azemore

Executed this
20th day of July
1964 by Surveyor &
Copy of the original on
Lawrence W. Thorne

Charlie Azemore PH
E. A. Watson D. A.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

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 CONTINENTAL TRAILWAYS BUS COMPANY, INC.,
a corporation, and LAWRENCE W. THAMES, jointly and severally

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 CONTINENTAL...
Trailways Bus Company, Inc., a Corporation, and LAWRENCE W. THAMES,
jointly and severally..... Defendant.....

by ROLAND HARRIS, a minor suing by and through his next friend and
father, MELVIN HARRIS,..... Plaintiff.....

Witness my hand this 16 day of July 1964

63-7-14-64

Theresa J. Moore Clerk

No. 6104

Page 2292

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ROLAND HARRIS, a minor suing
by and through his next friend
and father, MELVIN HARRIS

Plaintiffs

⁷⁴ vs.
CONTINENTAL TRAILWAYS BUS COMPANY,
INC., a Corporation, and LAWRENCE
W. THAMES, jointly & severally

Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

JUL 10 1964

ALICE J. DUCK, CLERK
REGISTER

Clerk

DUCK AND LACEY
Fairhope, Alabama

RECEIVED

Plaintiff's Attorney

JUL 13 1964
Defendant's Attorney

SHERIFF'S OFFICE

See inside

Defendant lives at

Received In Office

7/10 1964

....., Sheriff

I have executed this summons

this July 17 1964

by leaving a copy with

Mr Burdick, manager
Continental Trailways
Bus Company Inc

7-14-64
Lawrence W. Thames
not found in my books

sent for da and
RAY L. BRIDGES Sheriff

By E. Giller

Ray L. Bridges Sheriff

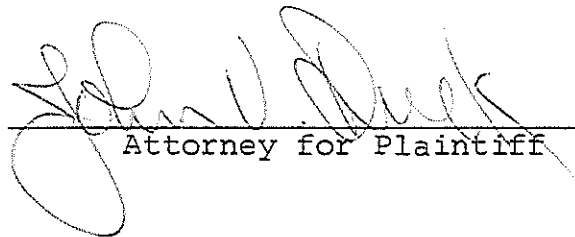
E. Giller Deputy Sheriff

ROLAND HARRIS, a minor, suing)	IN THE CIRCUIT COURT OF
by and through his next friend)	BALDWIN COUNTY, ALABAMA
and father, MELVIN HARRIS,)	
Plaintiff,)	AT LAW CASE NO. 6106 ⁶¹
vs.)	
COLONIAL TRAILWAYS, INC., and)	
LAWRENCE W. THAMES, jointly and)	
severally,)	
Defendants.)	

AMENDED BILL OF COMPLAINT

Comes now the Plaintiff in the above styled cause and amends his Bill of Complaint filed in this cause to read as follows:

To change the name from the Defendants to read as COLONIAL TRAILWAYS, INC., a Corporation, and LAWRENCE W. THAMES, jointly and severally.


 Attorney for Plaintiff

FILED
 FEB 2 1935
 ALICE L. DICK, CLERK
 REGISTERED

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

THOS. E. TWITTY
FRANCIS H. INGE (1902-1959)
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III

MAILING ADDRESS:

P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:

TWINING
TELEPHONE
HEMLOCK 3-5441

July 27, 1964

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

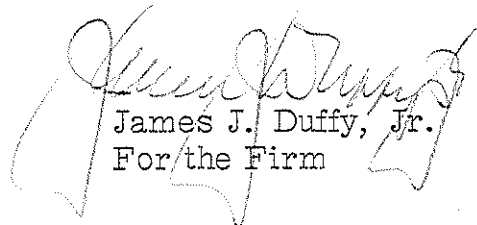
Dear Mrs. Duck:

I am enclosing herewith the originals of the demurrers I have prepared in Case No. 6104, Case No. 6105, Case No. 6106, and Case No. 6107, and request that you file the same upon receipt. I have forwarded copies of said demurrers to John.

I would appreciate your advice as to when these will be argued as well as when you expect the cases to be set for trial.

With much appreciation.

Yours very truly,


James J. Duffy, Jr.
For the Firm

JJDjr/mn
Enclosures

JOHN V. DUCK
RICHARD C. LACEY

DUCK & LACEY
Attorneys at Law
FAIRHOPE, ALABAMA

319 MAGNOLIA AVENUE
P. O. BOX 296
TELEPHONE 928-2191

July 2, 1965

Mrs. Alice J. Duck
P. O. Box 239
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing three (3) drafts from Security Insurance Group of Hartford, Connecticut in the case of Lessa Williams, 6173 a minor, vs. Colonial Trailways, Roland Harris, a minor, = 6104 vs. Colonial Trailways, and Melvin Harris, Jr., a minor, = 6105 vs. Colonial Trailways.

Would you please have Judge Mashburn enter Judgments in each of the above cases for \$100.00 and forward a certified copy of the Judgment along with a cost bill to Inge, Twitty, Duffy & Prince, Attorneys, P. O. Box 1109, Mobile, Alabama, so that the costs may be paid.

Also, please dismiss the case of Julia Jones vs. Colonial Trailways and Eddie Jones vs. Colonial Trailways and enclose the cost bills to Inge, Twitty, Duffy & Prince so that your costs may be paid in this matter. 6106 6107

Sincerely,

John V. Duck

JVD:lh
Encs.

done
7-7-65

REFERENCES

MERCHANTS NATIONAL BANK BUILDING

2480

www.ck12.org © 2012 CK12

$$\sigma \in \mathcal{C}_\infty(\mathbb{R}^d, \mathbb{R}^d) : \sigma(x) = x \text{ for } |x| \geq R$$

4055 E. 5th Ave.
Denver, CO

0018-9267/92/0005-0000\$05.00/0

[illegible]

$\mathcal{L}(\mathcal{A}) = \{ \langle \mathcal{A}, \mathcal{A} \rangle \}$

[illegible]

Figure 1 is a schematic representation of the experimental design. It consists of four panels arranged horizontally. Each panel shows a subject in a car, viewed from the side, looking forward at a road. In the first three panels, the subject is looking at a car ahead on the road. In the fourth panel, the subject is looking at a road with a car ahead. The panels are labeled with numbers 1, 2, 3, and 4. The first three panels show the subject in a car, and the fourth panel shows the subject in a car looking at a road with a car ahead.

FROM: *Walter L. Smith*
10000 1st Street
San Diego, Calif.
92161

Message
Reply

DATE:

FILE NO:

ATTENTION:

SUBJECT:

PRIORITY

- ☐ URGENT!
☐ SOON AS POSSIBLE
☐ NO REPLY NEEDED

TO: *Mrs. Alice L. Smith*
10000 1st Street
San Diego, Calif.

10000 1st Street, San Diego, Calif. 92161
San Diego, Calif. 92161

DATE: *10/10/61*

Dear Mrs. Smith:

Sincerely yours,

SIGNED: *Walter L. Smith*

DATE OF REPLY:

REPLY TO:

SIGNED: *Walter L. Smith*

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.