

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Moody Ray Knight 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 same, then and there to answer the complaint of Celia Mitchum.

Witness my hand this 9 day of September, 1964.

  
Clerk

6182

CELIA MITCHUM,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
	I	
vs.	I	BALDWIN COUNTY, ALABAMA
	I	
MOODY RAY KNIGHT,	I	AT LAW
Defendant.	I	

COUNT ONE:

The Plaintiff claims of the Defendant the sum of \$600.00 damages for that on, heretofore to-wit, the 28th day of March, 1964, on Hoyle Avenue in front of Hadley Motor Company in the city of Bay Minette, Baldwin County, Alabama, the Defendant did so negligently operate a motor vehicle as to cause or allow the same to collide with the motor vehicle of the Plaintiff and as a proximate result of the negligence of the Defendant aforesaid, the motor vehicle of the Plaintiff was damaged in that: the left rear fender was bent, damaged or broken; the left rear tail lamp and its assembly was bent, damaged or broken; the front and rear bumpers were bent, damaged or broken; the front grill was bent, damaged or broken and the hood was bent, damaged or broken; the right front head lamp and its assembly was bent, damaged or broken all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff further claims of the Defendant the further sum of \$5,000.00 damages for that on, heretofore to-wit, the 28th day of March, 1964, on Hoyle Avenue in front of Hadley Motor Company in the city of Bay Minette, Baldwin County, Alabama, the Defendant did so negligently operate a motor vehicle as to cause or allow the same to collide with the motor vehicle of the Plaintiff and as a proximate result of the negligence of the Defendant aforesaid, the Plaintiff was damaged in that she received a severe injury to her neck which caused her to experience great pain and suffering and which will continue to cause pain and suffering; she incurred hospital and medical expenses for treatment of said neck injury and she was caused to lose time from her employment, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason

The Plaintiff respectfully demands trial of this cause by a jury.

CHASON, STONE & CHASON

By: John Earle Chason

EX- 9-10-64

FILED  
SEP. 9 1964  
ALICE J. DUCK, CLERK  
REGISTER

Received 9 day of Sept 1964  
and do 10 day of Sept 1964  
I served a copy of the within Q.A.C.  
on Moody Ray Knight

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. Wilkins D. S.  
O mi

CELIA MITCHUM,  
Plaintiff,

vs.

MOODY RAY KNIGHT,  
Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

CELIA MITCHEM,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
VS.	)	
	)	AT LAW NO. 6182
MOODY RAY KNIGHT,	)	
	)	
Defendant.	)	

AMENDED PLEA

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


"Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof, separately and severally, says, separately and severally:

"1. Not guilty.

"2. At the time and place complained of, the plaintiff herself was guilty of negligence which proximately contributed to her damages and injuries because of which she should not recover in this action.

"3. For further plea and by way of recoupment, the defendant claims of the plaintiff the sum of Two Hundred Fifty Dollars (\$250.00) damages for that heretofore on to-wit, March 28, 1964, on Hoyle Avenue in front of Hadley Motor Company in the City of Bay Minette, Baldwin County, Alabama, the plaintiff did so negligently operate a motor vehicle so as to cause or allow it to run into, upon or against the motor vehicle of the defendant and as a proximate result of the negligence of the plaintiff aforesaid, the motor vehicle of the defendant was damaged as follows: the right front of the defendant's automobile was bent, broken and damaged; the right front fender was bent, broken and damaged; the front bumper was bent, broken and damaged, all to the damage of the defendant in the sum aforesaid, hence this suit.

/s/ JAMES R. OWEN  
Attorney for Defendant"

  
Attorney for Defendant

**FILED**  
JUN 1 1965  
ALICE J. DICK, CLERK  
RECEIVED

CELIA MITCHUM,  
 Plaintiff,  
 VS.  
 MOODY RAY KNIGHT,  
 Defendant.

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 IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 AT LAW NO. 6182

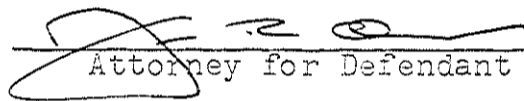
PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof separately and severally says, separately and severally:

1. Not guilty.

2. At the time and place complained of, the plaintiff herself was guilty of negligence which proximately contributed to her damages and injuries because of which she should not recover in this action.

**FILED**  
 OCT 6 1964

  
 Attorney for Defendant

ALICE J. DUCK, CLERK  
 REGISTER