

ARCHIE LAWRENCE,

Plaintiff,

vs.

DONALD GRAY NELSON,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6216

PLEA

Comes now the Defendant in the above styled cause, by his attorneys, and for answer to the Complaint heretofore filed against him in the above styled cause files the following plea:

2. That the Plaintiff did, at the time and place alleged in the Complaint so negligently operate a motor vehicle as to cause or allow the same to run upon or against the motor vehicle of the Defendant and as a proximate consequence of the said negligence of the Plaintiff the motor vehicle of the Plaintiff was damaged as alleged in the Complaint.

CHASON, STONE & CHASON

By:

John Earle Chason

FILED

DEC 14 1964

ALICE J. DUCK, CLERK
REGISTER

ARCHIE LAWRENCE,

Plaintiff,

vs.

DONALD GRAY NELSON,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

PLEA

Comes now the Defendant in the above styled cause and for answer to the Complaint heretofore filed in the above styled cause files the following plea.

1. Not guilty.

CHASON, STONE & CHASON

FILED

OCT 13 1964


ALICE J. DUGL. CLERK
REGISTER

By:

John Earle Chason
Attorneys for Defendant

ARCHIE LAWRENCE)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
-VS-)	AT LAW: 6216
DONALD GRAY NELSON)	
Defendant)	

The Plaintiff claims of the Defendant the sum of TWO HUNDRED FIFTY DOLLARS (\$250.00) as damages, for that heretofore, on, to-wit,: the 14th day of July, 1964, the Defendant so negligently operated a motor vehicle along and on Highway Number U. S. 98, at a point thereon, approximately nine-tenths (9/10) of a mile north of the City Limits of Fairhope, Alabama, and being then and there a public Highway in Baldwin County, Alabama, as to allow it to run into, upon or against the motor vehicle of the Plaintiff, and as a direct and proximate result of the negligence of the Defendant, as aforesaid, the Plaintiff's automobile was rendered a total loss, all as a result of the Defendant's negligence, as aforesaid, hence this suit.


 Attorney for Plaintiff

Deft. may be served at
 Served at Rt. I, Box 342
 Daphne, Alabama.

FILED
 SEP 30 1964
 ALICE I. DUCK, CLERK
 REGISTER

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 DONALD GRAY NELSON

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.....

DONALD GRAY NELSON

....., Defendant.....

by

ARCHIE LAWRENCE

..... Plaintiff.....

Witness my hand this 30 day of Sept 1964

Alice Dilbeck Clerk

E-71-10-5-64

8-2283

No. 6216 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ARCHIE LAWRENCE

Plaintiffs

vs.

DONALD GRAY NELSON

Defendants

SUMMONS AND COMPLAINT

Filed SEP 30 1964 19.....

..... ALICE J. DUCK Clerk
CLERK
REGISTER

John V. Duck
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne

Received In Office

Rt. I., Box 342

Daphne, Alabama 10/19/64

Taylor Wilkins Sheriff

I have executed this summons

this Oct 5 1964

by leaving a copy with

Donald Gray Nelson

Daphne Ala

54
TAYLOR WILKINS Sheriff
RP
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff