

TULA SHANNON EARLE, a Minor,)
by her next friend and)
Father, JAMES M. EARLE,)

IN THE CIRCUIT COURT OF

Plaintiff,)

BALDWIN COUNTY, ALABAMA

vs.)

LAW SIDE.

LUTHER T. MINOTE,)

Defendant.)

6314

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of TWENTY THOUSAND AND NO/100 DOLLARS (\$20,000.00) as damages, for that on, to-wit, November 23, 1963, the Defendant so negligently operated a motor vehicle on Highway 59, approximately 4.5 miles North of Bay Minette, Alabama, where said highway is a public highway in the County of Baldwin, State of Alabama, as to cause or allow said motor vehicle to collide with the motor vehicle which was then and there being operated by Plaintiff's mother, Louquin Turk Earle, and in which said Plaintiff was a passenger, at said time and place, and as a direct and proximate result and consequence of the aforesaid negligence of the Defendant, Plaintiff suffered severe cuts, bruises and sprains, was made sick, sore and lame, suffered severe pain and mental anguish and was permanently injured; hence this suit.

J. Connor Owens, Jr.
J. Connor Owens, Jr.

Louis E. Braswell
Louis E. Braswell
Attorneys for Plaintiff

Of Counsel:

HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON.

Plaintiff demands a trial of this
cause by a Jury.

J. Connor Owens, Jr.

FILED
11-23-64
ALICE L. DICK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

LUTHER T. HINOTE

201 POWELL AVENUE

BAY MINETTE, ALABAMA

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 Luther T. Hinote

-----, Defendant-----

by TULA SHANNON EARLE, a Minor, by her next friend and Father

JAMES M. EARLE

-----, Plaintiff-----

Witness my hand this 23 day of November 19 64

64-11-28-65

Price of clerk, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Wula Shannon Earle
by her father & next men
James M. Earle
Plaintiffs

VS.

vs.
Luther C. Hixite

Defendants

Summons and Complaint

Filed 11-23 1964

Benjamin Clerk

J. Connor Owens
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

11/25, 1964

Sheriff.

I have executed this summons

this Nov 28 1964

by leaving a copy with

Further Note

Taylor Williams Sheriff
W A Talbot Deputy Sheriff.

TULA SHANNON EARLE, a Minor, X
by her next friend and
Father, JAMES M. EARLE, X

Plaintiff

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

VS

AT LAW

NO. 6314

LUTHER T. HINOTE X

Defendant X

Comes the defendant in the above styled cause and
demurs to the complaint filed in said cause and for demurrer
shows unto this Honorable Court as follows:

1. That said complaint fails to state a cause of
action.

2. That said complaint fails to allege that the
driver of said motor vehicle was operating said motor vehicle
in a place where said driver had a right to be.

THOMPSON & WHITE

BY:

[Signature]
Attorneys for defendant.

FILED

DEC 21 1964

ALICE L. DUCK, CLERK
REGISTER

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