

LOUQUIN TURK EARLE	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
vs	X	BALDWIN COUNTY, ALABAMA	
LUTHER T. HINOTE	X	AT LAW	NO. 6315
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.

FILED

DEC 21 1964

ALICE J. DUCK, CLERK
REGISTER

THOMPSON & WHITE

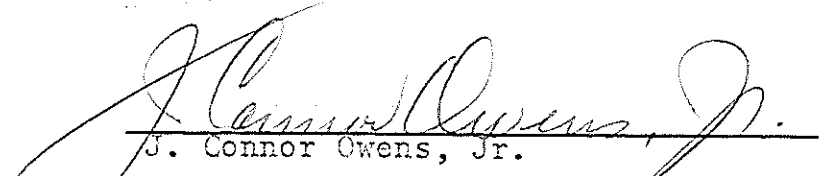

BY:

[Signature]
Attorneys for defendant.

LOUQUIN TURK EARLE,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA
vs.)	
LUTHER T. HINOTE,)	
)	LAW SIDE.
Defendant.)	

COUNT ONE:

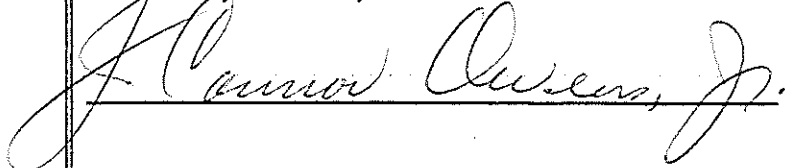
The Plaintiff claims of the Defendant, the sum of TWENTY THOUSAND AND NO/100 DOLLARS (\$20,000.00) as damages, for that on, to-wit, November 23, 1963, the Defendant so negligently operated a motor vehicle on Highway 59, approximately 4.5 miles North of Bay Minette, Alabama, where said highway is a public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


 J. Connor Owens, Jr.

 Louis E. Braswell
 Attorneys for Plaintiff.

Of Counsel:

HAND, ARENDALL, BEDSOLE,
 GREAVES & JOHNSTON

Plaintiff demands a trial of this
 cause by a Jury.



FILED

NOV 28 - 8-

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

LUTHER T. MINOTE

You Are Commanded to Summon

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. Minote

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

by LOUQUIN TURK EARLE

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

Witness my hand this 23 day of November 1964

-----, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Longwin, Turk Earle

Plaintiffs

VS.

VS.
Luther C. Zinke

Defendants

Summons and Complaint

Filed

11-23

1964

_____ Clerk

J. Connor Owens
Plaintiff's Attorney

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

11/25, 1962

Sheriff.

I have executed this summons

this

Dec-1

195

by leaving a copy with

Tyler Wilkins
 D Q Tolbert
 Deputy Sheriff.

Sheriff.

She

Deputy Sheriff.

[Handwritten signature]

LOUQUIN TURK EARLE	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
LUTHER T. MINOTE	X	AT LAW NO. 6315
Defendant	X	

Comes the defendant in the above styled cause and propounds the following interrogatories to the plaintiff, Louquin Turk Earle:

1. State your name.
2. Are you the complainant in Civil Jury Case No. 6315?
3. If your answer is "yes", are you the wife of James M. Earle?
4. Are you the mother of Tula Shannon Earle?
5. Were you driving a 1962 Valiant sedan going North of Bay Minette on Alabama Highway 59 on November 23, 1963, about 4:00 P.M.?
6. About this time did you collide with a 1960 Chevrolet sedan driven by Luther Minote?
7. If your answer to the foregoing question is "yes", state the approximate distance at which you first saw Mr. Minote's automobile.
8. State the approximate distance at which you saw Mr. Minote begin a left turn.
9. State what you did on seeing Mr. Minote begin a left turn.
10. Was the child, Tula Shannon Earle in the car with you?
11. State what the child did about the time of the collision?
12. Did you apply your brakes to avoid a collision?
13. About how far did you skid, if any?
14. Did you observe the skid marks after the accident?
15. Do you know how many wheels showed effective braking by leaving skid marks?
16. Were you hospitalized?
17. State the name of your attending physician and obtain a statement from him of his diagnosis of your condition at the

time you were hospitalized.

THOMPSON & WHITE

BY:

C. LeNoir Thompson
Attorneys for defendant.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am one of the Attorneys of Record for the defendant in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the plaintiff to the foregoing interrogatories will, if truthfully made, be material evidence for the defendant on the trial of said cause.

C. LeNoir Thompson
C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 13th day of January, 1965.

Glenn A. Page
Notary Public, Baldwin County, Alabama

FILED

JAN 19 1965

ALICE J. DUCK, CLERK
REGISTER

The undersigned, attorney
of record for plaintiff in
this cause, does hereby
accept service of the
above this the 20 day
January, 1965.
James Owens, Jr.

