

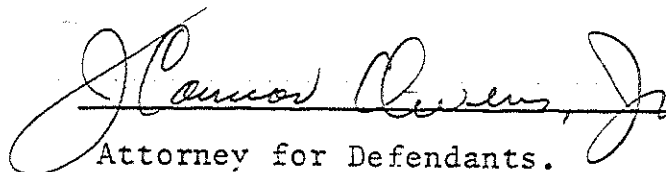
CURTIS E. FENT,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
vs.)	BALDWIN COUNTY, ALABAMA
JOE COOKE and MRS. JOE COOKE,)	
whose name is otherwise un-)	LAW SIDE. NO. 6375.
known to your Plaintiff,)	
Defendants.)	

DEMURRER:

Now come the Defendants, by their attorney, and demur to the Complaint filed in this cause and as grounds therefor, assign the following, both separately and severally:

1. The Complaint does not state a cause of action.
2. Said complaint does not allege any negligent action of the Defendant, Joe Cooke.
3. The allegation of the complaint that the Defendant, Joe Cooke, caused a collision, is a conclusion of the pleader.
4. The complaint does not allege with certainty the negligent actions of the Defendant, Joe Cooke.
5. The allegation that the Defendant, Joe Cooke, negligently ran said vehicle in front of and across the line of travel of the Plaintiff's vehicle, is vague, uncertain and indefinite.
6. The allegation that the Plaintiff suffered injuries to his left knee is vague and indefinite.
7. The complaint does not allege what injuries the Plaintiff suffered to his left knee.

FILED
FEB 20 1965
ALICE I. DUCK, CLERK
REGISTER


Attorney for Defendants.

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT . . .LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:-

You are hereby commanded to summon JOE COOKE and MRS. JOE COOKE (whose name is otherwise unknown to your plaintiff) to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding same, within thirty (30) days from the service of this summons and complaint, then and there to demur to or to plead to the complaint of CURTIS E. FENT.

You are hereby commanded to execute this process instanter and make return as required by law.

WITNESS my hand this 28 day of January, 1965.

Alice J. Duck
Clerk

COMPLAINT

CURTIS E. FENT,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
JOE COOKE and MRS. JOE COOKE,)	LAW SIDE
whose name is otherwise)	6375
unknown to your Plaintiff,)	
)	
Defendants.)	

Plaintiff claims of the Defendants the sum of TEN THOUSAND DOLLARS (\$10,000.00), as damages for that on, to-wit, the 26th day of December, 1964, at approximately 7:50 o'clock a.m., while operating a motor vehicle along and upon Alabama Highway 59 within the corporate limits of the City of Robertsdale, Baldwin County, Alabama, approximately one-fourth mile south of the intersection of Highway 59 and Highway 90, the Defendant, Joe Cooke, who was then and there operating a vehicle belonging to the Defendant, Mrs. Joe Cooke, and was acting as agent and servant of the said Mrs. Joe Cooke at this time and place within the line and scope of his employment as such, negligently ran said vehicle in front of and across the line of travel of

Plaintiff's vehicle and as a proximate consequence of the negligence of the Defendant, Joe Cooke, then and there acting within the line and scope of his agency or employment, in and about the operation of said motor vehicle at said time and place caused a colision and bent and broke the left front portion of Plaintiff's automobile, including the left front fender, the left headlight, bumper, grill, radiator, and did other damage to this portion of Plaintiff's vehicle and caused Plaintiff injury in that he suffered lacerations, contusions and bruises to his face and injury to his left knee and caused him to be hospitalized and caused him to expend sums for treatment of his injury and caused him to be shocked and shaken and he was made sick and sore and caused to suffer great physical pain, all to Plaintiff's damage as aforesaid.


Attorney for Plaintiff

Plaintiff demands trial
by jury.


Attorney for Plaintiff

FILED

JAN 28 1965

ALICE L. DICK, CLERK
REGISTERED

EX-21-65

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

CURTIS E. FENT,
Plaintiff,

VS.

JOE COOKE and MRS. JOE
COOKE, whose name is other-
wise unknown to Plaintiff,

Defendants.

olved 28 day of Jan 1965
on 1 day of Feb 1965
red a copy of the within Joe Cooke & Mrs.
Joe Cooke
service on _____

TAYLOR WILKINS, Sheriff
By Charles Childers D. S.

R. H. Wile

Sheriff claims 100 miles at 10 00
Ten Cents per mile Total \$ 10.00
TAYLOR WILKINS, Sheriff
BY Charles Childers
DEPUTY SHERIFF

6375
SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

CURTIS E. FENT,

Plaintiff,

VS

JOE COOKE and MRS. JOE
COOKE, whose name is other-
wise unknown to Plaintiff,

R'dale - Defendants

FILED
JAN 28 1965
ALICE J. DUCK, CLERK
REGISTER

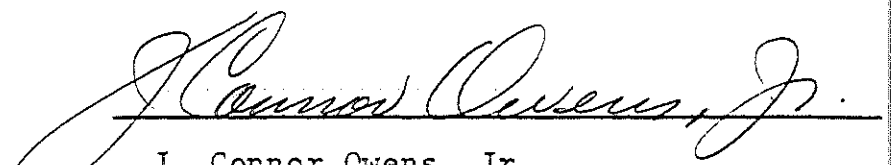
CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

CURTIS E. FENT,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	
JOE COOKE and MRS. JOE COOKE,)	LAW SIDE. NO. 6375.
whose name is otherwise un-)	
known to your Plaintiff,)	
Defendants.)	

ANSWER:

Come now the Defendants, by their attorney, and for answer to the Complaint plead as follows:

1. Not guilty.
2. That at the time and the place complained of in the said complaint and immediately prior thereto, the Plaintiff, Curtis E. Fent, was himself guilty of contributory negligence which proximately contributed to the injuries complained of, in that he so negligently operated his motor vehicle at the said time and at the said place complained of, so as to cause or allow the said motor vehicle to run into, on or against the motor vehicle operated by the Defendant, Joe Cooke, which said negligence proximately contributed to the injuries and damages complained of in the complaint, hence the Plaintiff should not recover.


 J. Connor Owens, Jr.,
 Attorney for Defendants.

FILED

APR 27 1966

ALICE J. DUCK, CLERK
 REGISTER

ANSWER

CURTIS E. FENT,

Plaintiff,

vs.

JOE COOKE and MRS. JOE COOKE,
whose name is otherwise un-
known to your Plaintiff,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE, NO. 6375.

~~W. J. CONNOR~~
~~W. J. CONNOR & J. H. OWENS~~
ATTORNEYS AT LAW
DAHLBERG BUILDING
BAY MINETTE, ALABAMA

CURTIS E. FENT,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
vs.)	BALDWIN COUNTY, ALABAMA
JOE COOKE and MRS. JOE COOKE,)	
whose name is otherwise un-)	LAW SIDE. NO. 6375.
known to your Plaintiff,)	
Defendants.)	

AMENDED PLEA

Come now the Defendants, in the above styled cause and for further plea to the complaint heretofore filed, says as follows:

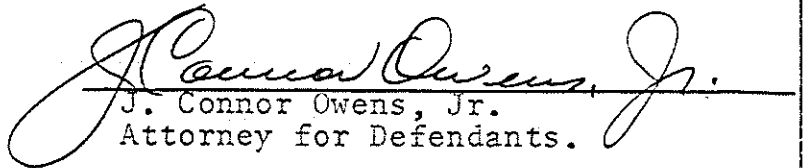
3. For further plea and by way of recoupment, the Defendant Joe Cooke, claims of the Plaintiff the sum of \$5,000.00 damages, for that heretofore on, to-wit, the 26th day of December, 1964, at approximately 7:50 o'clock A. M., while operating a motor vehicle along and upon Alabama Highway #59, within the corporate limits of the City of Robertsdale, Baldwin County, Alabama, approximately one-fourth mile South of the intersection of Highway #59 and Highway #90, at a point upon the public road in Baldwin County, Alabama the Plaintiff, Curtis E. Fent so negligently operated his motor vehicle so as to cause or allow it to run into, upon or against the motor vehicle which the Defendant, Joe Cooke, was then operating and as a proximate result of the negligence of the Plaintiff aforesaid, the Defendant was injured about the face, limbs and body, his dentures were broken; he suffered numerous contusions and sprains; he suffered severe pains of the chest; that the Defendant lost two weeks from his labors; that he incurred certain medical, doctors and hospital bills; that he suffered great pain and anguish, all to the damage of the Defendant, Joe Cooke, in the sum aforesaid, hence this suit.

4. For further plea and by way of recoupment, the Defendant, Mrs. Joe Cooke, claims of the Plaintiff the sum of \$1100.00 damages for that heretofore on, to-wit, the 26th day of December, 1964, at approximately 7:50 o'clock A. M., while operating a motor

vehicle along and upon Alabama Highway #59, within the corporate limits of the City of Robertsdale, Baldwin County, Alabama, approximately one-fourth mile South of the intersection of Highway #59 and Highway #90, at a point upon the public road in Baldwin County, Alabama, the Plaintiff, Curtis E. Fent so negligently operated his motor vehicle so as to cause or allow it to run into upon or against the motor vehicle which the Defendant, Joe Cooke was then operating and as a proximate result of the negligence of the Plaintiff, the motor vehicle of the Defendant, Mrs. Joe Cooke, was totally destroyed, all to the damage of the Defendant, Mrs. Joe Cooke, hence this suit.

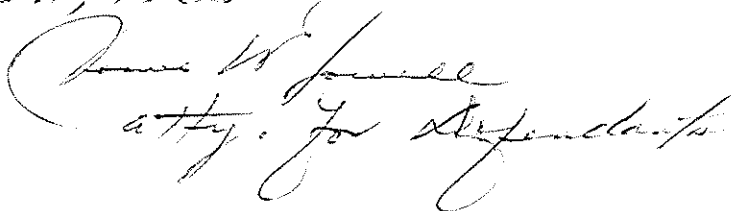


James W. Howell,
Attorney for Defendants.



J. Connor Owens, Jr.
Attorney for Defendants.

copy served on Plaintiff's Attorney
Dec. 9, 1965



att'y. for Defendants



VOTE FOR AND SUPPORT

MISS EVELYN **CREAMER**

Candidate For

**SECRETARY OF STATE
OF ALABAMA**

Dedicated to honest, efficient State Government

Subject to the Democratic Primary, May 1, 1962



Pd. Pol. Adv. by friends of Miss Evelyn Creamer