

HELEN D. ANDERSON, as Administratrix )	IN THE CIRCUIT COURT OF
of the ESTATE OF CHARLES REYNOLDS )	
ANDERSON, JR., Deceased, )	BALDWIN COUNTY, ALABAMA
Plaintiff, )	AT LAW
vs. )	6393
LONNIE JOHNSON, )	
Defendant. )	

COUNT I

Plaintiff, HELEN D. ANDERSON, who sues as the Administratrix of the ESTATE OF CHARLES REYNOLDS ANDERSON, JR., Deceased, claims of the Defendant the sum of ONE HUNDRED THOUSAND AND NO/100 (\$100,000.00) DOLLARS as damages for that heretofore on, to-wit: the 7th day of January, 1965, while Plaintiff's intestate was driving a motor vehicle on Highway U. S. #98, at a point thereon one-quarter (1/4) of a mile from the traffic light in Daphne, Alabama, which was then and there a public highway in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to allow it to run into, upon or against Plaintiff's intestate's automobile, and by reason thereof and as the proximate result and consequence thereof, Plaintiff's intestate received personal injuries from which he died.

COUNT II

Plaintiff, as Administratrix of the ESTATE OF CHARLES REYNOLDS ANDERSON, JR., Deceased, claims of the Defendant the sum of ONE HUNDRED THOUSAND AND NO/100 (\$100,000.00) DOLLARS as damages for that heretofore and on, to-wit: the 7th day of January, 1965, the Defendant so negligently operated a motor vehicle on Highway U. S. #98, at a point thereon one-quarter (1/4) of a mile from the traffic light in Daphne, Alabama, which was then and there a public highway in Baldwin County, Alabama, as to run into, upon or against Plaintiff's intestate's vehicle, causing Plaintiff's intestate to sustain injuries from which he afterwards died, wherefore Plaintiff sues. And Plaintiff avers that the death of her said intestate was proximately caused by the wilful, wanton or intentional conduct of the Defendant.

  
ATTORNEY FOR PLAINTIFF

The Defendant can be served at  
Grand Hotel, Point Clear, Ala.,  
or Rt. 1, Box 68, Daphne, Ala.

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 LONNIE JOHNSON

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.....

LONNIE JOHNSON

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

by HELEN D. ANDERSON, as Administratrix of the Estate of CHARLES

REYNOLDS ANDERSON, JR., Deceased,

....., Plaintiff.....

Witness my hand this.....15.....day of Feb.....1965

EX-2-22-65

Alvin J. [Signature]..... Clerk

No. 6393 Page.....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

HELEN D. ANDERSON, as Administratrix  
of the ESTATE OF CHARLES REYNOLDS  
ANDERSON, JR., Deceased Plaintiffs

vs.

LONNIE JOHNSON

Defendants

SUMMONS AND COMPLAINT

Filed FEB 15 19.....

CLERK REGISTER Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Grand Hotel, Point Clear, Ala.  
or Rt. 1, Box 68, Daphne, Ala.

RECEIVED  
Received In Office

FEB 15 1965 19.....

TAYLOR WILKINS  
~~SHERIFF~~ Sheriff

I have executed this summons

this 2/22 1965  
by leaving a copy with

Lonnie Johnson

Sheriff claims 20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY Roy Randall  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff

Point Clear

HELEN D. ANDERSON, as Admini-	§		
stratrix of the ESTATE OF			
CHARLES REYNOLDS ANDERSON,	§	IN THE CIRCUIT COURT OF	
JR., Deceased,			
	§		
Plaintiff,		BALDWIN COUNTY, ALABAMA	
	§		
vs.			
	§		
LONNIE JOHNSON,	§	AT LAW	NO. 6393
Defendant.	§		

DEMURRER

Comes now the Defendant in the above styled cause by his attorneys and demurs to the Complaint heretofore filed against him in the above styled cause and to each and every count thereof, separately and severally and shows unto the Court the following grounds in support thereof:

1. Said Complaint fails to state a cause of action against the Defendant.
2. Said Complaint is vague, indefinite and uncertain.
3. Said Complaint does not allege with sufficient certainty the place where the accident occurred.
4. The Complaint fails to allege that the negligence of the Defendant proximately caused the injuries to the Plaintiff's intestate.
5. The Complaint fails to allege that the injuries to the Plaintiff's intestate were the proximate result of the negligence of the Defendant.
6. The Complaint fails to allege that the death of the Plaintiff's intestate was the proximate result of the injuries allegedly inflicted by the Defendant.
7. Count II of the Complaint fails to allege that the Defendant willfully, wantonly or intentionally operated his vehicle at said time and place.

8. Count II of said Complaint fails to allege that the Defendant willfully, wantonly or intentionally ran his motor vehicle into the vehicle of the Plaintiff's intestate.

9. Count II of the Complaint fails to allege that the Defendant willfully, wantonly or intentionally injured the Plaintiff's intestate.

10. Count II of the Complaint fails to allege that the Defendant willfully, wantonly or intentionally caused the death of the Plaintiff's intestate.

CHASON, STONE & CHASON

By:

John Earle Chason

*Filed. 3-11-65*

HELEN D. ANDERSON, as Admr. of  
the ESTATE OF CHARLES REYNOLDS  
ANDERSON, JR., Deceased,

Plaintiff,

vs.

LONNIE JOHNSON,

Defendant.

6393

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DEMURRER

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FILED

MAR 11 1964

CLERK OF COURT

HELEN D. ANDERSON, as Administratrix )	IN THE CIRCUIT COURT OF
of the ESTATE OF CHARLES REYNOLDS )	
ANDERSON, JR., Deceased. )	BALDWIN COUNTY, ALABAMA
Plaintiff, )	AT LAW CASE NO. 6393
vs. )	
LONNIE JOHNSON, )	
Defendant. )	

Comes now the Plaintiff in the above styled cause, and amends the Bill of Complaint filed heretofore to read as follows:

COUNT ONE

Plaintiff, HELEN D. ANDERSON, who sues as the Administratrix of the ESTATE OF CHARLES REYNOLDS ANDERSON, JR., Deceased, claims of the Defendant the sum of ONE HUNDRED THOUSAND AND NO/100 (\$100,000.00) DOLLARS as damages for that heretofore, on, to-wit: the 7th day of January, 1965, while Plaintiff's intestate was driving a motor vehicle on Highway U. S. No. 98 at a point thereon one-quarter of a mile from the traffic light in Daphne, Alabama, which was then and there a public highway in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to allow it to run into, upon or against Plaintiff's intestate's automobile, and by reason thereof and as the proximate result and consequence thereof, Plaintiff's intestate received personal injuries from which he died.

COUNT TWO

Plaintiff, as Administratrix of the ESTATE OF CHARLES REYNOLDS ANDERSON, JR., Deceased, claims of the Defendant the sum of ONE HUNDRED THOUSAND AND NO/100 (\$100,000.00) DOLLARS as damages for that heretofore and, on, to-wit: the 7th day of January, 1965, the Defendant so wantonly and wilfully operated a motor vehicle on Highway U. S. No. 98 at a point thereon one-quarter of a mile South of the traffic light at Daphne, Alabama, which was then and there a public highway in Baldwin County, Alabama, as to run into, upon or against Plaintiff's intestate's vehicle and the Defendant did then and there wantonly and wilfully injure the said Plaintiff's intestate

and as a direct and proximate consequence of the said injury, Plaintiff's intestate afterwards died.

WHEREFORE, Plaintiff sues.

*John J. Duck*  
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 27 day of October, 1965  
*Plaintiff*  
Attorney for

FILED  
10-28-65  
ALMA J. DUCK, CLERK  
REGISTER