

STATE OF ALABAMA
COUNTY OF BALDWIN

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)
)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ELSIE BUCKWRIGHT to appear and answer, plead or demur, within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held at the place of holding the same, then and there to answer to the complaint of Raymond Beaty, Jr., a minor, by his next of friend Elouise M. Beaty, and Elouise M. Beaty, individually.

WITNESS my hand this the 15 day of October, 1965.

Defendant may be served
at the trailer on Joe
Schneider's corner at Greeno
Rd. and Fairhope Ave., in
Fairhope, Alabama.

W. J. H. H. H.
Clerk of Circuit Court

RAYMOND BEATY, JR., a minor, by his)
next of friend ELOUISE M. BEATY, and)
ELOUISE M. BEATY, individually,)

Plaintiffs)

VS.)

ELSIE BUCKWRIGHT,)

Defendant)

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA - AT LAW

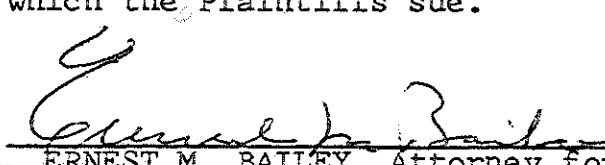
CASE NO: 6734

COUNT ONE:

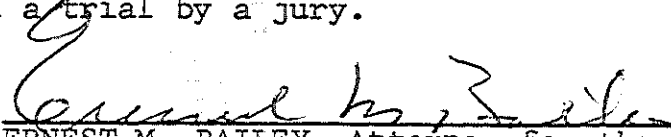
The Plaintiff, Raymond Beaty, Jr., suing by his mother and next friend Elouise M. Beaty, claims of the Defendant the sum of TEN THOUSAND DOLLARS (\$10,000.00) for that heretofore and on, to-wit, February 5, 1965 the Defendant did negligently operate an automotive vehicle on and along Section Street at or near its intersection with Morphy Avenue, both being public streets in the City of Fairhope, Baldwin County, Alabama, as to run upon, over and against a motor scooter being operated by the Plaintiff, Raymond Beaty, Jr., on Morphy Avenue at the time and place aforesaid and as a direct and proximate result of the Defendant's negligence, the Plaintiff, Raymond Beaty, Jr., sustained a severe broken leg and was made sick and sore and suffered physical pain and mental anguish. The Plaintiffs aver that the said Raymond Beaty, Jr. was gainfully employed at the time of the accident and loss time from his employment, and; the

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Plaintiffs were caused to spend large sums of money for doctors bills, for medical attention, and medical supplies in and about the treatment of his injuries, all for which the Plaintiffs sue.


ERNEST M. BAILEY, Attorney for the
Plaintiffs

The Plaintiffs demand a trial by a jury.


ERNEST M. BAILEY, Attorney for the
Plaintiffs.

EX-10-18-65



BILL OF COMPLAINT

Received 15 day of Oct 1965

and on 18 day of Oct 1965

I served a copy of the within Doc
on Elsie Buckwright

By service on

Taylor Wilkins
TAYLOR WILKINS, Sheriff

By Roy Randall

RAYMOND BEATY, JR., A minor
by his next of friend ELOUISE
M. BEATY, and ELOUISE M.
BEATY, individually,

Plaintiffs

VS

ELSIE BUCKWRIGHT,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO: 6734

Sheriff claims 70

Ten Cents per mile 7.00

BY Roy Randall
DEPUTY SHERIFF

FILED

OCT 15 1965

ALICE L. DUCK CLERK
REGISTER

RAYMOND BEATY, JR., a minor,
by his next of friend ELOUISE
M. BEATY, and ELOUISE M. BEATY,
individually,

Plaintiffs,

vs.

ELSIE BUCKWRIGHT,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6734

DEMURRER

Comes the Defendant in the above styled cause and demurs
to the Complaint filed in said cause and assigns the following
separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That said Complaint is a suit by mother and next
friend of Raymond Beaty, Jr. without any allegation that he is a
minor or non compos mentis.
3. That there is a misjoinder of causes of action in
such Complaint.
4. That there is a misjoinder of parties Plaintiff in
said Complaint.
5. That the place where the accident occurred is not
sufficiently set out.
6. That Elouise M. Beaty, individually, claims damages
for the broken leg sustained by Raymond Beaty, Jr. and for his
physical pain and mental anguish which is contrary to the laws
of the State of Alabama.
7. That Elouise M. Beaty, individually, claims damages
for the loss of time by Raymond Beaty, Jr. which is contrary to
the laws of the State of Alabama.
8. That said Complaint does not allege any duty owing
by the Defendant to Elouise M. Beaty, individually.

FILED

NOV 1 1965

ALICE L. DUCK, CLERK
REGISTER

James Stone Carson
Attorneys for Defendant

RAYMOND BEATY, JR., a minor,
by his next of friend ELOUISE
M. BEATY, and ELOUISE M. BEATY,
individually,

Plaintiffs,

vs.

ELSIE BUCKWRIGHT,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6734

* * * * *

DEMURRER

* * * * *

Jury

6734

ERNEST M. BAILEY
ATTORNEY AT LAW
221 FAIRHOPE AVE.
FAIRHOPE, ALABAMA

BOX 161

October 14, 1965

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Re: Raymond Beaty, Jr., et al
vs. Elsie Buckwright

Dear Mrs. Duck:

I will appreciate you having service made on
the attached Bill of Complaint in the above
matter.

Thanking you in advance, I am

Very truly yours,

Ernest M. Bailey
Ernest M. Bailey
EMB/w