

6470

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 A. ARZEN SHARP and JOHN DOE, the latter being an individual whose name is otherwise unknown to the Plaintiff, but will be added by amendment when ascertained, 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 FREDERICK EUGENE COLEY.

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

WITNESS my hand this 15 day of April, 1965.

[Signature]
Clerk

COMPLAINT

FREDERICK EUGENE COLEY,)	
)	
Plaintiff,)	
)	IN THE CIRCUIT COURT OF
vs.)	
)	
A. ARZEN SHARP and JOHN DOE, the)	BALDWIN COUNTY, ALABAMA
latter being an individual whose)	
name is otherwise unknown to the)	
Plaintiff, but will be added by)	LAW SIDE
amendment when ascertained,)	
)	
Defendants.)	

The Plaintiff claims of the Defendants FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages for, that on, to-wit, the 13th day of May, 1964, the Defendants, A. Arzen Sharp and John Doe, the latter being an individual whose name is otherwise unknown to the Plaintiff, but will be added by amendment when ascertained, negligently caused a vehicle under which the Plaintiff was lying rendering assistance to Defendants to fall from a jack onto the Plaintiff crushing his face or cheek bone; causing him pain and


Attorney for Plaintiff

E. H. Hansen
Attorney for Plaintiff

FILED

APR 15 1965

ALICE L. DUCK, CLERK
REGISTERED

FREDERICK EUGENE COLEY,

Plaintiff,

- VS -

A. ARZEN SHARP and JOHN DOE, the
latter being an individual whose
name is otherwise unknown to the
Plaintiff, but will be added by
amendment when ascertained,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

* * * * *

SUMMONS AND COMPLAINT

* * * * *

Received 16 15 day of April 1965
nd on 27 April 1965
served a copy of 54c
A. Arzen Sharp

Service on Ray L. Bridges
Taylor Wilkins, Sheriff
B. E. Ginniff D. S.
L. B. Smith

turned 15 day of April 1965
not found in my county after diligent search and in-
quiry. as to John Doe
Taylor Wilkins, Sheriff

By _____ Deputy Sheriff

7th No. 6470 2783

FREDERICK EUGENE COLEY,

Plaintiff

E
27th Jan vs -

A. ARZEN SHARP and JOHN DOE, the
latter being an individual whose
name is otherwise unknown to the
Plaintiff, but will be added by
amendment when ascertained,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

SUMMONS AND COMPLAINT

REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.
APR 15 1965
MICK L. DUCK, CLERK
REGISTER
CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

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 A. ARZEN SHARP and JOHN DOE, the latter being an individual whose name is otherwise unknown to the Plaintiff, but will be added by amendment when ascertained, 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 FREDERICK EUGENE COLEY.

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

WITNESS my handthis 15 day of April, 1965.

Richard L. Smith
Clerk

COMPLAINT

FREDERICK EUGENE COLEY,)	
)	
Plaintiff,)	
)	IN THE CIRCUIT COURT OF
vs.)	
)	
A. ARZEN SHARP and JOHN DOE, the)	BALDWIN COUNTY, ALABAMA
latter being an individual whose)	
name is otherwise unknown to the)	
Plaintiff, but will be added by)	LAW SIDE
amendment when ascertained,)	
)	
Defendants.)	

The Plaintiff claims of the Defendants FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages for that on, to-wit, the 13th day of May, 1964, the Defendants, A. Arzen Sharp and John Doe, the latter being an individual whose name is otherwise unknown to the Plaintiff, but will be added by amendment when ascertained, negligently caused a vehicle under which the Plaintiff was lying rendering assistance to Defendants to fall from a jack onto the Plaintiff crushing his face or cheek bone; causing him pain and

suffering; causing him great mental anguish; causing him to expend sums for medical and surgical treatment, drugs and hospitals; causing him to lose time from his business; causing him permanent injury; the above injuries and damages are the proximate result and consequence of the negligence of the Defendants, A. Arzen Sharp and John Doe, the latter being an individual whose name is otherwise unknown to the Plaintiff, but will be added by amendment when ascertained. The injury to the Plaintiff as aforesaid occurred near the Town of Gulf Shores, in Baldwin County, Alabama.


Attorney for Plaintiff

Plaintiff demands trial by jury.


Attorney for Plaintiff

Last known address of A. ARZEN SHARP:
455 North Craft Highway
Pritchard, Alabama

FILED
JUN 12 1962
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ALABAMA

* * * * *
SUMMONS AND COMPLAINT
* * * * *

FOR FILE

BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF

* * * * *
Defendants.
* * * * *

amendment when ascertained,
Plaintiff, but will be added by
tacter being an individual whose
A. ARZEN SHARP and JOHN DOE, the

Plaintiff,

FREDERICK NUGENT COFFY,

150-97730

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

April 13, 1965

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

Dear Mrs. Duck:

Enclosed is original and two copies of Summons and Complaint in the case of Frederick Eugene Coley vs. A. Arzen Sharp, et al. Kindly deliver to the Sheriff for service.

Yours very truly,



C. G. Chason

CGC:jc

Encls.

FREDERICK EUGENE COLEY,

Plaintiff,

VS.

A. ARZEN SHARP and JOHN DOE,
the latter being an individual whose
name is otherwise unknown to the
plaintiff, but will be added by
amendment when ascertained,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
NO. 6470

DEMURRER

Now comes the defendant, A. Arzen Sharp, and demurs to
the complaint heretofore filed in said cause and as grounds for
said demurrer assign the following, separately and severally:

1. The complaint does not state a cause of action.
2. The complaint does not allege how the defendant, A.
Arzen Sharp, was negligent.
3. The complaint does not allege how the plaintiff was
injured.
4. The complaint does not allege any negligence on the
part of the defendant, A. Arzen Sharp, which caused the plaintiff's
alleged injuries.
5. The place where the alleged accident occurred is not
described with sufficient certainty.


Attorney for A. Arzen Sharp

FILED

MAY 12 1965

ALICE J. DUCK, CLERK
REGISTER