

PERCY BROWN
Plaintiff
vs
HENRY BISHOP and
FREDDIE WILLIAMS
Defendants

X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NO. 6517

COUNT ONE:

The plaintiff claims of the defendants the sum of Five Hundred (\$500.00) Dollars as damages for that heretofore on to-wit: March 5, 1965, said plaintiff was a passenger in an automobile being operated on or along a public highway in Baldwin County, Alabama, in the intersection of County Road 40 and County Road 39, where he had a right to be and Freddie Williams, agent, servant or employee of Henry Bishop, defendant, so negligently operated his motor vehicle which he was then and there operating so as to run into, over, upon or against the automobile in which your said plaintiff was then and there riding as a passenger and plaintiff avers that as a proximate consequence thereof, he was severely injured, suffering cuts, bruises and contusions and was hospitalized for medical treatment which he received and as the result of said injuries suffered the loss of wages, all of which damages where approximately caused by the said negligence of said defendants agent, servant or employee.


Attorney for Plaintiff.

FILED

5-14-65

MAILED MAY 14 1965
CLERK OF COURT

PERCY BROWN,

Plaintiff,

Vs

HENRY BISHOP and
FREDDIE WILLIAMS,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

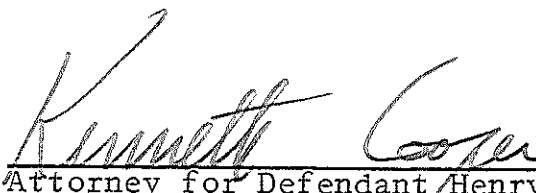
AT LAW

CASE NO. 6517

DEMURRER

Comes now the defendant Henry Bishop, by his attorney, and demurs to the complaint heretofore filed in this cause, and assigns as ground therefor the following reasons:

1. The complaint does not state a cause of action.
2. The complaint is vague.
3. The complaint is indefinite.
4. The complaint does not allege the date of the alleged accident.
5. The complaint does not allege with certainty where the alleged accident took place.
6. The complaint does not allege the exact amount of hospital and medical expenses incurred.
7. The complaint does not allege the exact amount of damage to the automobile.
8. The complaint does not allege the exact amount of loss of wages.
9. The complaint does not allege whether the automobile allegedly driven by the defendant Freddie Williams was owned by Freddie Williams or the defendant Henry Bishop.
10. The Complaint fails to allege any right of recovery by the plaintiff.
11. The complaint fails to allege whether the plaintiff was riding in the automobile he was in as a paid passenger or as a guest thereof.


Attorney for Defendant Henry Bishop

Attorney of Record for Plaintiff:
Hon C. Lenoir Thompson
Bay Minette, Alabama

FILED

JUN 21 1985

CLERK
JUNE 1, 1985

PERCY BROWN,
Plaintiff

Vs.

HENRY BISHOP and
FREDDIE WILLIAMS,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6517

DEMURRER

Comes now the defendant Henry Bishop, by his attorney, and demurs to the complaint heretofore filed in this cause, and assigns as grounds therefor, the following reasons to each count thereof, separately and severally:

1. The complaint does not allege whether the automobile allegedly driven by the defendant Freddie Williams was owned by Freddie Williams or the defendant Henry Bishop.
2. The complaint does not specify which "defendants agent, servant or employee" caused the damages complained of.
3. The complaint fails to allege any right of recovery by the plaintiff.
4. The complaint fails to allege whether the plaintiff was riding in the automobile he was in as a paid passenger or as a guest thereof.
5. The complaint does not state a cause of action.


Attorney For Defendants

Attorney of Record
For Plaintiff:

Hon C. Lenoir Thompson
Bay Minette, Alabama

FILED
DEC 2 1935
ALICE A. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4517

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Henry Bishop and Freddie Williams

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 Henry Bishop and
Freddie Williams----- Defendant-----

by Percy Brown

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

Witness my hand this 14 day of May 19 65

67-5-21-65

Arthur J. French, Clerk

No. 6517

Page _____

STATE of ALABAMA**Baldwin County****CIRCUIT COURT**Perry Brown

Plaintiffs

vs.

Henry Bishop &
Freddie Williams

Defendants

Summons and ComplaintFiled 5-14 1965Reis French ClerkC. L. Thompson
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at between
Stapleton & Bromley, inquire at
Biggs' Serv. Sta. or A. H. Hale.

Received In Office

May 14, 1965

Sheriff.

I have executed this summons

this May 21 1965
by leaving a copy withHenry Bishop
Freddie WilliamsSheriff claims 28 miles atTen Cents per mile Total \$ 2.80

TAYLOR WILKINS, Sheriff

by W. A. Talbot

DEPUTY SHERIFF

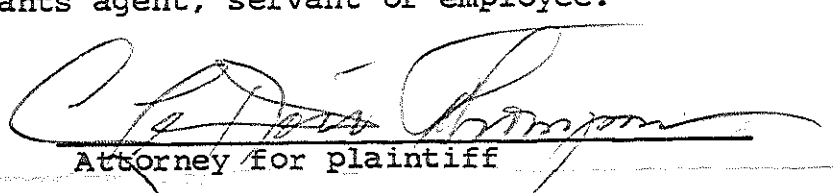
Taylor Wilkins
Sheriff.W. A. Talbot
Crossroad Deputy Sheriff.

AMENDED COMPLAINT

PERCY BROWN	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff	X	BALDWIN COUNTY, ALABAMA
vs	X	AT LAW NO. _____
HENRY BISHOP and FREDDIE WILLIAMS	X	
	X	
Defendants	X	

COUNT ONE

The plaintiff claims of the defendants the sum of Five Hundred (\$500.00) Dollars as damages for that heretofore on to-wit: March 5, 1965, said plaintiff was a passenger in an automobile being operated on or along a public highway in Baldwin County, Alabama, in the intersection of County Road 40 and County Road 39, where he had a right to be and Freddie Williams agent, servant or employee of Henry Bishop, defendant, in the line and scope of his employment so negligently operated his motor vehicle which he was then and there operating so as to run into, over, upon or against the automobile in which your said plaintiff was then and there riding as a passenger and plaintiff avers that as a proximate consequence thereof, he was severely injured, suffering cuts, bruises and contusions and was hospitalized for medical treatment which he received and as the result of said injuries suffered the loss of wages, all of which damages were approximately caused by the said negligence of said defendants agent, servant or employee.


Attorney for plaintiff

I hereby certify that I have this 26 day of November, 1965, mailed a copy of the foregoing amended complaint to Honorable Kenneth Cooper, attorney for defendants to his address in Bay Minette, Alabama.

