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FOLEY, ALABAMA

February 26, 1965

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette,

Enclosure: Summons and Complaint--Cooke vs Fent

6409

DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW, NO. 6409

Comes the Defendant in the above styled cause and demurs to the Bill of Complaint heretofore filed therein and as grounds for demurrer shows separately and severally the following:

1. The Complaint does not state a cause of action.
2. That the Complaint is vague and indefinite.
3. That the location where said collision allegedly occurred is not set out with sufficient certainty.

*EGH*  
Attorney for Defendant

~~Attorney~~ for Defendant

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2025

ALICE J. BARK, CLERK  
REGISTERED

JOSEPH E. COOKE,	)	IN THE CIRCUIT COURT OF
	)	
PLAINTIFF,	)	BALDWIN COUNTY, ALABAMA
	)	
vs.	)	
	)	
CURTIS FENT,	)	
	)	
DEFENDANT.	)	AT LAW, NO. <u>6409</u>

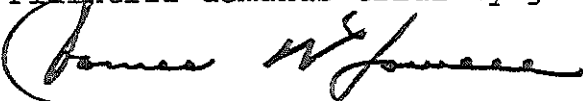
The Plaintiff claims of the Defendant the sum of FIVE THOUSAND DOLLARS (\$5,000.00) as damages, for that, heretofore on, to-wit: the 26th day of December, 1964, the Plaintiff was operating an automobile on a public highway, viz: Highway #59, also known as Milwaukee Street in Robertsdale, Alabama, in Baldwin County, where he had a right to be, and the Defendant so negligently operated a motor vehicle then and there, as to cause said motor vehicle he was operating to run over, upon or against the automobile which the Plaintiff was then and there operating; and Plaintiff avers that as a proximate cause and consequence thereof he was injured about the face, limbs and body, that his dentures were broken, that he suffered numerous contusions and sprains, that he suffered a severe bruise of the chest and will continue to so suffer for an indeterminate period of time, that as a proximate result and consequence of said injuries Plaintiff lost two weeks from his labors, that his capacity for work has been greatly reduced, that his services are reasonably worth ONE HUNDRED FIFTY DOLLARS (\$150.00) per week and he avers that the same are reasonable and claims the same of the Defendant; that he has to date expended in excess of FOUR HUNDRED DOLLARS (\$400.00) for hospital bills, doctor's bills and dental bills; and that Plaintiff's automobile was so greatly damaged that it was not economically repairable and was therefore a total loss save for salvage value, wherefore Plaintiff avers as the prox-

imate result of Defendant's negligence Plaintiff was  
damaged in the amount of FIVE THOUSAND DOLLARS (\$5,000.00)  
as aforesaid, hence this suit.



JAMES W. HOWELL  
Attorney for Plaintiff

Plaintiff demands trial by jury.



JAMES W. HOWELL  
Attorney for Plaintiff

FILED  
MAR 17 1935  
ALLIANCE BANK  
RECORDS