

INEZ NORSWORTHY,
Plaintiff,
vs.
BERNARD L. SHAPIRO,
Defendant.

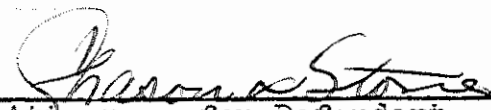
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.
NO. 3259

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 sufficiently state the place where the accident occurred.
2. That the last paragraph of the complaint is surplusage.
3. That the allegation in the complaint that the Defendant is a non-resident is not a proper allegation and only seeks to prejudice the jury.


Attorneys for Defendant

June 13, 1957

INEZ NORSWORTHY, Plaintiff

VS

BERNARD L. SHAPIRO, Defendant

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

CASE NO. 3259

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW:

I, Mary Texas Hurt, Secretary of State, hereby certify that on May 30, 1957
I sent by registered mail in an envelope addressed as follows:

"

Bernard L. Shapiro
10 East 85th Street
New York, New York"

"Registered Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

"

Bernard L. Shapiro
10 East 85th Street
New York, New York

You will take notice that on May 30, 1957 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: INEZ NORSWORTHY, Plaintiff VS BERNARD L. SHAPIRO, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

Case No. 3259 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and
effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 30
day of May 1957

Enclosure (1)

(Signed) Mary Texas Hurt
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed
as above set forth had attached to it a true copy of the summons and complaint in the above-styled
cause.

I further certify that on June 13, 1957 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at New York 3, N. Y. Cooper Station
on Date not given

WITNESS MY HAND and the Great Seal of the State of Alabama this the 13 day
of June 1957

Mary Texas Hurt Garner
Mary Texas Hurt
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Honorable T. J. Mashburn
Attorney at Law
Box 192
Bay Minette, Alabama

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon BERNARD L. SHAPIRO, 10 East 85th Street, New York, New York, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of INEZ NORSEWORTHY.

Witness my hand this 29th day of May, 1957.

Deane A. Deane
CLERK OF THE CIRCUIT COURT OF BALD-
WIN COUNTY, ALABAMA.

各級政府應設法給我輩青年以訓練機會並應設法使青年有發展機會

INRE: NONSWORTHY.

Plaintiff.

75.

EDWARD L. CHAPIRO.

Defendant.



IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW. NO.

C O N T E N T S

The Plaintiff claims of the defendant Two Thousand Five Hundred (\$2,500.00) Dollars as damages for that on, heretofore, to-wit, the 15th day of May, 1957, at a point on, or near, the D'Olive Street Cutt-off, on U. S. Highway No. 31, in the City of Bay Minette, Baldwin County, Alabama, at about 4:20 o'clock, P. M., the defendant so negligently operated an automobile which he was then and there driving that, by reason of and as the proximate result and consequence of the negligence of the said defendant, the said automobile ran over, upon or against an automobile in which plaintiff was a passenger, and plaintiff received severe personal injuries in this, to-wit: She was bruised and sprained about the neck, shoulders and back; she was made sick, sore and lame; she was permanently injured; she was internally injured; her nervous system was permanently injured; and she was forced to expend considerable sums for medical treatment in and about the treatment of her said injuries.

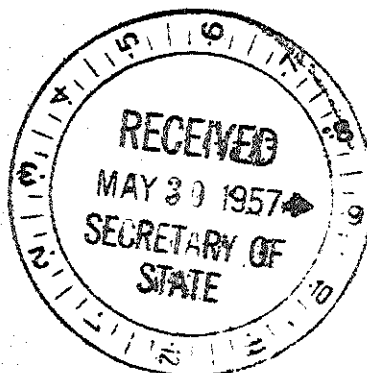
And plaintiff avers that all of her injuries and damages as aforesaid were the direct and proximate result and consequence of the negligence of the defendant in and about the operation of his automobile at the time and place herein complained of; all to the damage of the plaintiff as aforesaid; hence this suit.

And plaintiff further avers that the defendant, BERNARD L. SHAPIRO, is and was on the date of said collision, to-wit: the 15th day of May, 1957, a non-resident of the State of Alabama and that his address is 10 East 85th Street, New York, New York; and the plaintiff prays that service of process upon the defendant, BERNARD L. SHAPIRO, may be had in accordance with the provisions of Paragraph 199, Title 7, of the Code of Alabama of 1940.

Isidore J. Maslowsky
ATTORNEY FOR PLAINTIFF.

Plaintiff demands that this cause be tried by a jury.

Isidore J. Maslowsky
ATTORNEY FOR PLAINTIFF.



STATE OF ALABAMA, 0
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COUNTY OF BALDWIN. 0

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Witness my hand this 29th day of May, 1957.

Eric L. Smith
CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

INEZ NORSWORTHY,	0	
	0	
Plaintiff,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
	0	AT LAW. NO. _____
BERNARD L. SHAPIRO,	0	
	0	
Defendant.	0	

C O U N T O N E

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And plaintiff avers that all of her injuries and damages as aforesaid were the direct and proximate result and consequence of the negligence of the defendant in and about the operation of his automobile at the time and place herein complained of; all to the damage of the plaintiff as aforesaid; hence this suit.

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Julius A. Madbury, Jr.
ATTORNEY FOR PLAINTIFF.

Plaintiff demands that this cause be tried by a jury.

Julius A. Madbury, Jr.
ATTORNEY FOR PLAINTIFF.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN LAW. NO. 3259

INEZ NORSWORTHY,
Plaintiff,
VS.
BERNARD L. SHAPIRO,
Defendant.

SUMMONS AND COMPLAINT.

FILED

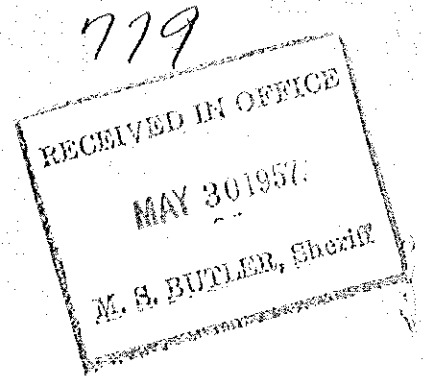
MAY 29 1957

ALICE J. BUCK, Clerk

TELFAIR J. MASHBURN, JR.

ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

Defendant may be served at:
10 East 85th Street
New York, New York.



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Executed by serving 3 copies of
the within on Mary Texas Hurt,
Secretary of State of The State of
Alabama.
This the 30 day of May 1957
Sheriff of Montgomery County
M. S. Butler,
By Goodwyn D. S.

