

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Theodore O. Sharp 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 Sylvia C. Rodgers.

WITNESS my hand this 23rd day of May, 1966.

Alice J. Black
Clerk

The defendant's address is Bay Minette, Alabama.

* * * * *

SYLVIA C. RODGERS,

Plaintiff,

VS.

THEODORE O. SHARP,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

6975'

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant the sum of One Hundred Seventy-five Dollars (\$175.00) for that heretofore on to-wit, December 16, 1965, at a point on U. S. Highway 31, three-tenths of a mile north of the center of Stapleton where the said U. S. Highway 31 intersects with White House Forks Road, the plaintiff was driving her automobile in a northerly direction along said highway at a place where she had a right to be and at said time and place the defendant so negligently operated an automobile as to cause it to run into, upon or against the automobile of plaintiff and as a proximate result of the negligence of the defendant the said automobile of plaintiff was damaged as follows: the trunk deck lid was bent and broken; the rear bumper was bent and damaged; the left rear fender was bent and plaintiff was forced to be without the use of her said automobile for several days. Plaintiff avers that all of her injuries and damages were due to the negligence of the defendant at said time and place, hence this suit.

214 J. B. BLACKBURN and JAMES R. OWEN

By

[Signature]
Attorneys for plaintiff

Executed
June 6, 1966

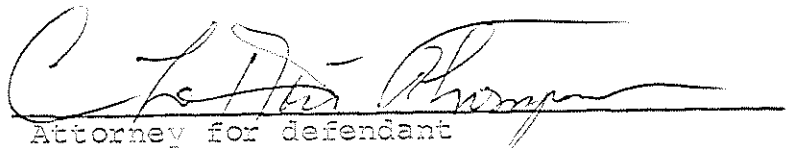
FILED
MAY 23 1966
ALICE J. BLACK, CLERK
RECEIVED

SYLVIA C. RODGERS
Plaintiff
vs
THEODORE O. SHARP
Defendant

X
X
X
X
X
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6975

Comes the defendant and for demurrer to the complaint
filed in said cause shows unto this Honorable Court as
follows:

1. That said complaint fails to allege whether said
accident occurred in the daytime or in the nighttime.


Attorney for defendant

Defendant demands trial by jury.

FILED
MAY 28 1968
ALICE J. DUCK, CLERK
REGISTER


Attorney for defendant.

SYLVIA C. RODGERS	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
VS	X	BALDWIN COUNTY, ALABAMA	
THEODORE O. SHARP	X	AT LAW	NO. 6975
Defendant	X		

Comes the defendant in the above styled cause and for answer to the complaint filed in said cause shows unto this Honorable Court as follows:

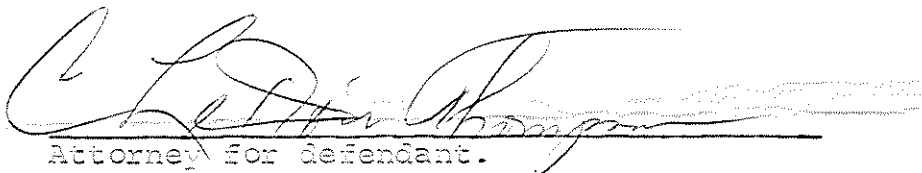
1. The defendant for answer to said complaint saith that he is not guilty of the matters alleged therein.

2. For further answer to said complaint, the defendant says the plaintiff ought not to recover in this case for that on the occasion complained of the said Sylvia C. Rodgers was herself guilty of negligence which contributed proximately to the injuries complained of in said complaint, in that she failed to give any signal before stopping or drastically slowing down suddenly, all of which occurred on U. S. numbered highway 31 in Baldwin County at the intersection of said U. S. Highway numbered 31 and the White House Forks Road turning West North of the Community of Stapleton. Said plaintiff was driving her automobile in a Northerly direction along said highway and negligently stopped suddenly without signalling, whereby your said defendant had insufficient notice of her change in speed and her said actions were the proximate cause of said contributory negligence on the part of said plaintiff.

3. Comes the defendant and without in any way confessing plaintiff's claim or demand as a defense to the action of the plaintiff, says::

That at the time said action was commenced the said plaintiff was indebted to the defendant in the sum of One Hundred Fifty (\$150.00) Dollars in that as the said defendant was proceeding North along Highway numbered 31 in Baldwin County about .3 of a mile North of the center of Stapleton at the junction of U. S. highway numbered 31 and the White House Forks Community Road, the said plaintiff acting suddenly and without any warning stopped or drastically slowed her said automobile which she was then and there operating causing a collision between her said automobile

and the automobile operated by your said defendant and as a consequence of the said plaintiff's negligence, the front end of your said defendant's automobile was damaged and broken and made less valuable, all to the damage of your said defendant, which your said defendant hereby offers to set off against the demand of the plaintiff and he claims judgment for the excess.


Attorney for defendant.

FILED

AUG 8 1966

ALICE J. DUCK, CLERK
REGISTER

Rogers 15. Shultz.

JURY LIST - DECEMBER 12, 1966

1. Allen, Norman W., Farmer, Gateswood
2. Andress, Herbert E., Farmer, Foley
3. Boros, Anthony J., Farmer, Elberta
4. ~~Bene, R. Gray, Oil Driller/Secon, Bay Minette~~
5. Childress, Guy, Farmer, Robertsdale
6. ~~Clayton, Percy, Mill Worker, Stockton~~
7. Clay, Harris, Mechanic, Fairhope
8. ~~Coligny, Ned, Farmer, Summerdale~~
9. Cooper, Grady, Farmer, Elseanor
10. ~~Cooper, Nolan P., Merchant, Rosinton~~
11. Dubose, James W., Gov't Emp., Gulf Shores
12. ~~Gamble, L. Jack, Salesman, Bay Minette~~
13. ~~Ginson, Leon Fisher, Mechanic, Bay Minette~~
14. ~~Graham, James R., Laborer, Bay Minette~~
15. ~~Grancham, Donald R., Farmer, Mag. Spgs.~~
16. ~~Gwathney, William H., Clerk, Robertsdale~~
17. ~~Hollies, Thomas G., Gulf Gas Agent, Robertsdale~~
18. Jerkins, Marvin E., Civil Service, Stapleton
19. ~~Jones, George, Business Operator, Daphne~~
20. ~~Kane, James, Farmer, Loxley~~
21. Kriss, Frank, Farmer, Silverhill
22. ~~Kanger, Stanley, Mechanic, Robertsdale~~
23. ~~Kasson, Joe, Jr., Farmer, Belforest~~
24. ~~Kazzari, John, Farmer, Belforest~~
25. ~~Mosley, Rufus, Farmer, Stapleton~~
26. ~~Movety, Milton J., Farmer, Robertsdale~~
27. ~~Owen, L.D., Jr., Merchant, Bay Minette~~
28. ~~Rhodes, Charles R., Farmer, Foley~~
29. ~~Rhodes, Elbert M., Farmer, Summerdale~~
30. ~~Rieben, Everett, Brookley, Bay Minette~~
31. Rieben, Ray, Paper Mill, Bay Minette
32. ~~Richerson, Mute, Laborer, Robertsdale~~
33. ~~Robinson, Odell, Contractor, Bay Minette~~
34. ~~Sedlock, Fred J., Farmer, Robertsdale~~
35. ~~Sheppard, Floyd, Farmer, Foley~~
36. ~~Simon, Frank, Farmer, Belforest~~
37. ~~Smith, Columbus, Mill Worker, Stockton~~
38. ~~Veal, Arthur, Attendant, Summerdale~~
39. Wilson, George, Airport Oper., Foley
40. Wilsey, James, Clerk, Loxley
41. ~~Welding, Bailey, Sr., Carpenter & Bricklayer, Daphne~~
42. Mason, Jimmy, Salesman, Fairhope
43. ~~Davidson, W.W., Turpentine Farmer, Bay Minette~~
44. ~~Marino, Percy, Mobile Housing Board, Daphne~~
45. ~~Heil, William, Farmer, Elberta~~
46. ~~Bryars, Charles Henry, Jr., Farmer, Stockton~~
47. ~~Childress, Mynatt, Farmer, Foley~~
48. Cock, John D., Merchant, Montrose
49. ~~Cooper, Charles, Farmer, Rosinton~~
50. ~~Polava, Clarence, Farmer, Mag. Spgs.~~
51. McLeod, George, State Emp., Gulf Shores
52. ~~Hodgeson, William M., Jr., Manufacturer, Bay Minette~~
53. ~~Lamar, Reuben, Laborer, Foley~~

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