

MILDREDGE L. LEGG,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
MILDRED M. GILL, JOHN DOE,	)	
RICHARD ROE, and MARY DOE and	)	
X, a person, firm, individual,	)	
association, or partnership,	)	
who was the principal, employ-	)	
er, master or superior of	)	
MILDRED M. GILL, at the time of	)	
the accident which is the sub-	)	
ject of this suit, whose names	)	
are otherwise unknown to the	)	
plaintiff, but which will be	)	
added by amendment when ascer-	)	
tained, separately and severa	)	
lly,	)	
Defendants.	)	CASE NO. <u>2033</u>

COMPLAINT

COUNT ONE

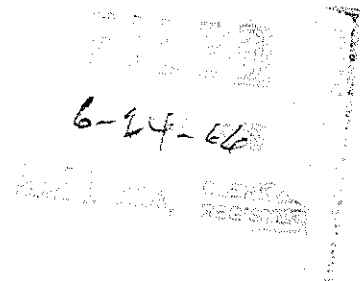
Plaintiff claims of the defendants, separately and severally, the sum of, to-wit, NINE HUNDRED FIFTY AND NO/100 (\$950.00) DOLLARS as damages, for that on, to-wit, July 4, 1965, defendant Mildred M. Gill so negligently operated an automobile on U. S. Highway #90, also known as Mobile Bay Causeway, also known as Battleship Parkway, at a point approximately 2 tenths of a mile west of Apalachee River, in the vicinity of Bens Barbecue, said Highway then and there being a public road in the County of Baldwin, State of Alabama, that the automobile then and there being operated by defendant Mildred M. Gill collided with the plaintiff's vehicle which was then and there being operated on said U. S. Highway #90, and as a proximate result of the negligence of the defendant as aforesaid, the plaintiff's said vehicle was bent, broken, smashed, rendered permanently less valuable, plaintiff was denied the use thereof for a period of

time, all to plaintiff's damages as aforesaid, WHEREFORE  
PLAINTIFF SUES.

LYONS, PIPES AND COOK  
Attorneys for Plaintiff

By: Augustine Mosher, III

Defendant Mildred M. Gill may be served at her residence in  
Silverhill, Baldwin County, Alabama.



LYONS, PIPES & COOK

ATTORNEYS AT LAW

25TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

JOSEPH H. LYONS (1900-1957)  
SAM W. PIPES, III  
WALTER M. COOK  
GORDON B. KAHN  
IRWIN W. COLEMAN, JR.  
G. SAGE LYONS  
WILLIAM F. HORSLEY  
AUGUSTINE MEAHER, III

AREA CODE 205  
TEL. 432-4483  
P. O. DRAWER 79

June 23, 1966

Mrs. Alice Duck  
Clerk of Circuit Court  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Mildredge L. Legg vs. Mildred M. Gill, et al.


Dear Mrs. Duck:

We enclose herein the complaint in the above referenced matter and request that it be filed with your Court. Please advise us when this case is set for trial.

Your assistance in this matter is greatly appreciated.

Yours very truly,

LYONS, PIPES AND COOK



Augustine Meaher, III

AM/lak

Enclosure

MILDREDGE L. LEGG,

X

Plaintiff,

X

vs.

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

AT LAW

MILDRED M. GILL, ET. AL.,

X

CASE NO. 7033

Defendants.

X

DEMURRER

Comes the Defendant, Mildred M. Gill, and demurs to the Complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said Complaint fails to state who was driving the automobile which belonged to the Plaintiff, at the time the accident occurred.

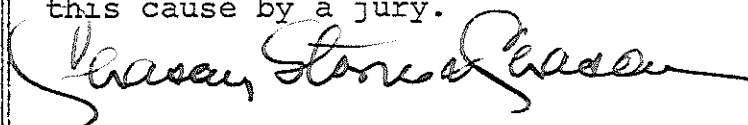
2. That said Complaint does not allege the manner in which the Plaintiff's automobile was damaged.

3. That said Complaint does not allege the period of time that the Plaintiff was unable to use such automobile.

4. That said Complaint does not allege that the Plaintiff was using her automobile in her business and that she suffered any loss by not being able to use the same.

  
Attorney for Mildred M. Gill

Defendant demands trial of  
this cause by a jury.



CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 1 day

of July, 1966



FILED  
JUL 7 1966  
CLERK  
REGISTER

MILDREDGE L. LEGG,

Plaintiff,

vs.

MILDRED M. GILL, ET. AL.,

Defendants.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7033

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

FILED

JUL 7 1900

ALICE L. DICK, CLERK  
REGISTER

MILDREDGE L. IEGG,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
MILDRED M. GILL, JOHN DOE,	)	
RICHARD ROE, and MARY DOE and	)	
X, a person, firm, individual,	)	
association, or partnership,	)	
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er, master or superior of	)	
MILDRED M. GILL, at the time of)	)	
the accident which is the sub-	)	
ject of this suit, whose names )	)	
are otherwise unknown to the	)	
plaintiff, but which will be )	)	
added by amendment when ascer-	)	
tained, separately and sever-	)	
ally,	)	
Defendants.	)	CASE NO. <u>2133</u>

COMPLAINT

COUNT ONE

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LYONS, PIPES AND COOK  
Attorneys for Plaintiff

By: Augustine Meaher  
Augustine Meaher, III

Defendant Mildred M. Gill may be served at her residence in  
Silverhill, Baldwin County, Alabama.

FILED  
JUL 24 1931  
CLERK  
RECEIVED

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7033

TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mildred M. Gill, et al

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.....

Mildred M. Gill, et al

Defendant.....

by Mildred L. Legg

Plaintiff.....

Witness my hand this 24th day of June 19.66

64-677-66

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Alice J. Duck

Clerk



No. 7033.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MILDREDGE L. LEGG,

Plaintiffs

vs.

MILDRED M. GILL, ET AL

Defendants

SUMMONS AND COMPLAINT

Filed ~~June~~ June 24th 1966.....

.....Alice J. Duck..... Clerk

LYONS, PIPES & COOK

Plaintiff's Attorney

Defendant's Attorney

*Silverhill*

Defendant lives at

RECEIVED

Received In Office

JUN 24 1966

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this *27 June* 19*66*  
by leaving a copy with

*Mildred M. Gill*

Sheriff claims *50* miles at

Ten Cents per mile Total \$ *5.00*

TAYLOR WILKINS, Sheriff

BY *CC*  
DEPUTY SHERIFF

*Taylor Wilkins* Sheriff

*Corliss Baker* Deputy Sheriff

*R. Wake*