

HARRY J. WILTERS, JR.  
TOLBERT M. BRANTLEY

LAW OFFICES OF  
WILTERS & BRANTLEY

P. O. BOX 968  
BAY MINETTE, ALABAMA

PHONE  
BAY MINETTE 937-5533

November 28, 1966

Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

Please dismiss the following cases for me:

Foye Waters as father and next of friend of Mathew Waters  
Case No. 7061

Foye Waters as father and next of friend of Farron Waters  
Case No. 7062

Foye Waters -- Farrell Waters  
Case No. 7063

Joyce Amos -- as mother of -- Marilyn Amos  
Case No. 7064

Gladys Waters  
Case No. 7065

John Waters  
Case No. 7066

Joyce Amos  
Case No. 7067

Foye Waters  
Case No. 7068

Yours truly,

WILTERS & BRANTLEY

BY:

  
Tolbert M. Brantley

TMB:ag

FOYE WATERS, as father and  
next friend of MATHEW  
WATERS, a minor,

Plaintiff,

vs.

JOE PAUL JONES,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 7061

DEMURRER

Comes now the Defendant in the above styled cause by  
and through his attorneys of record and demurs to the Bill of  
Complaint heretofore filed against him and shows unto the  
court the following grounds in support thereof:

1. Said Complaint fails to state a cause of action  
against the Defendant.

CHASON, STONE & CHASON

By

*John E. Chason*

FILED

AUG 31 1966

ALICE I. DICK, CLERK  
REGISTER

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 31 day  
of August, 1966

*John E. Chason*

FOYE WATERS, as father and  
next friend of MATHEW WATERS,  
a minor,

Plaintiff,

VS.

JOE PAUL JONES,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 7061

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Joe Paul Jones 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 Foye Waters, as father and next friend of Mathew Waters, a minor.

WITNESS my hand, this 19<sup>th</sup> day of July, 1966.

Alice D. Duck  
Clerk

FOYE WATERS, as father and  
next friend of MATHEW WATERS,  
a minor,

X

X

Plaintiff,

X

Vs.

X

JOE PAUL JONES,

X

Defendant.

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

7061

1.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS, as damages for that heretofore, on, to-wit, the 27th day of November, 1965, the Plaintiff's minor child, Mathew Waters, was riding in an automobile upon or along U. S. Highway #90, a public highway in Baldwin County, Alabama, at a point in Loxley, Alabama, at or near the place where the Daphne-Rosington Road intersects said highway. At said time and place, the Defendant so negligently operated the motor vehicle he was driving along said highway as to cause or allow the same to run into the automobile in which the Plaintiff's minor child, Mathew Waters, was riding and as a direct proximate consequence and result thereof, the Plaintiff's minor child, Mathew Waters, was bruised, skinned and caused discomfort, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS & BRANTLEY

BY:+

Robert M Brantley  
Attorney for the Plaintiff

Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

BY:

Robert M Brantley  
Attorney for the Plaintiff

Defendant's Address:

Georgiana, Alabama

FILED

JUL 19 1908

ALICE L. DICK, CLERK  
REGISTERED

Executed 7-28-08  
Sergeant Wilkins, Sher  
by C. Childress - also

RECEIVED

JUL 19 1961

TAYLOR WILKINS  
SHERIFF

CASE NO. 7061

FOYE WATERS, as father and next  
friend of MATHEW WATERS, a minor,

Plaintiff,

vs:

JOE PAUL JONES,

Defendant.

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 7061

WILTERS & BRANTLEY

Received \_\_\_\_\_ day of \_\_\_\_\_  
and on 28 day of July 1961  
I served a copy of the within 28C  
on Joe Paul Jones  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

Carole E. Robinson D.

Carole E. Robinson

Sheriff claims 64 miles at  
Ten Cents per mile 6.40  
TAYLOR WILKINS, Sheriff  
by Carole E. Robinson  
DEPUTY SHERIFF

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Joe Paul Jones 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 Mathew Waters, a minor, suing by his father and next friend, Foye Waters.

WITNESS my hand, this \_\_\_\_\_ day of October, 1966.

\_\_\_\_\_  
Clerk

-----

FOYE WATERS, as father and next friend of MATHEW WATERS, a minor	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
	X	BALDWIN COUNTY, ALABAMA
Vs.	X	AT LAW
JOE PAUL JONES,	X	
Defendant	X	

Comes now the Plaintiff in the above styled cause and amends his complaint as follows:

MATHEW WATERS, a minor, suing by his father and next friend, FOYE WATERS,	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
	X	BALDWIN COUNTY, ALABAMA
Vs.	X	AT LAW
JOE PAUL JONES,	X	
Defendant	X	

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS, as damages for that heretofore, on, to-wit, the 27th day of November, 1965, the Plaintiff's minor child, Mathew Waters, was riding in an automobile upon or along U. S. Highway #90, a public highway in Baldwin County, Alabama, at a

point in Loxley, Alabama, at or near the place where the Daphne-Rosinton Road intersects said highway. At said time and place, the Defendant so negligently operated the motor vehicle he was driving along said highway as to cause or allow the same to run into the automobile in which the Plaintiff's minor child, Mathew Waters, was riding and as a direct proximate consequence and result thereof, the Plaintiff's minor child, Mathew Waters, was bruised, skinned and caused discomfort, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS & BRANTLEY

BY: *Robert M Brantley*  
Attorney for the Plaintiff

Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

BY: \_\_\_\_\_  
Attorney for the Plaintiff

Defendant's Address:

Georgiana, Alabama

FILED

ACT 21 1930

22 J. M. B. 2285  
REGISTER



7061

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

MATHEW WATERS, a minor,  
suing by his father and next  
friend, FOYE WATERS

Plaintiff

Vs.

JOE PAUL JONES

Defendant

AMENDED COMPLAINT

FILED  
OCT 21 1966  
ALAN L. WALKER, CLERK  
BALDWIN COUNTY, ALABAMA