

FOYE WATERS, as father and  
next friend of FARRON 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. 7062

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 Earle Chason

FILED  
AUG 31 1966  
AUG 1 1966  
AUG 1 1966

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 FARRON WATERS,  
a minor,

Plaintiff,

vs.

JOE PAUL JONES,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, CASE NO. 7062

\* \* \* \* \*

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 Farron Waters, a minor, suing by his father and next friend, Foye Waters.

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

\_\_\_\_\_  
Clerk

-----  
AMENDMENT

FOYE WATERS, as father	X	
and next friend of FARRON		
WATERS, a minor,	X	IN THE CIRCUIT COURT OF
Plaintiff	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:

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

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, Farron Waters, was riding in an automobile upon or along U. S. Highway #90, a public highway in Baldwin County, Alabama, at a point in

WILTERS &amp; BRANTLEY

BY:

WILTERS &amp; BRANTLEY

BY:

~~Georgiana, Alabama~~

# FILE

NOV 21 1966

ALL INFORMATION CONTAINED  
HEREIN IS UNCLASSIFIED

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

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

Vs.

JOE PAUL JONES, Defendant

AMENDED COMPLAINT

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 Farron Waters, a minor.

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

Alice J. Luck  
Clerk

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

Plaintiff,

Vs.

JOE PAUL JONES,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

7062

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, Farron 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, Farron Waters, was riding and as a direct proximate consequence and result thereof, the Plaintiff's minor child, Farron 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 1966

ALICE L. DICK, CLERK  
REGISTERED

Entered 7-28-66  
Ingrin Wilkner, Shiff  
by C. Childress - 485

CASE NO. 7062

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

Plaintiff,

vs:

JOE PAUL JONES,

Defendant.

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW,

WILTERS & BRANTLEY

RECEIVED

JUL 10 1968

TAYLOR WILKINS  
SHERIFF

Sheriff claims 64 miles at  
Ten Cents per mile Total \$ 6.40  
TAYLOR WILKINS, Sheriff  
by Charles Childress  
DEPUTY SHERIFF

Received 50 day of July 1968  
and on 50 day of July 1968  
served a copy of the within Joe Paul Jones  
in Joe Paul Jones  
by service on

TAYLOR WILKINS, Sheriff  
Charles Childress  
Eric C. Randle