

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 Gladys Waters.

WITNESS my hand, this 19th day of July, 1966.

Alice J. Luck
Clerk

GLADYS WATERS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
JOE PAUL JONES,	X	AT LAW
Defendant.	X	7065

1.

The Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS, as damages for that heretofore on, to-wit, the 27th day of November, 1965, the Plaintiff 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 was riding and as a direct proximate consequence and result thereof, the Plaintiff was severely injured; she was cut on the back of her head; she received contusions and abraisions; her back, hip and head were hurt; she was injured so that she was unable to do her household work and caused to expend large sums of money for doctor, hospital and medical treatment for the injuries which she received as a result of said negligence; the Plaintiff avers

that she was permanently injured, all to the loss of the Plaintiff
in the aforesaid amount.

WILTERS & BRANTLEY

BY:

Robert M Brantley
Attorney for the Plaintiff

Defendant's Address:

Georgiana, Alabama

Plaintiff demands a trial by jury.

FILED

OCT 29 1966

ALICE J. DICK, CLERK
REGISTERED

Executed 9-28-66
Lester Wilkins-Sher
by C. Childress - R/S

CASE NO. x 7065

GLADYS WATERS,

Plaintiff

vs:

JOE PAUL JONES,

Defendant

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW,

WILTERS & BRANTLEY

RECEIVED

JUL 19 1966

TAYLOR WILKINS
SHERIFF

Amount due \$64.00
Ten Cents
TAYLOR WILKINS
BY Carlie Childers
DEPUTY SHERIFF

Received _____ day of _____ 19____
and on 25 day of July 1966
I served a copy of the within 29 C
on Joe Paul Jones

By service on _____

TAYLOR WILKINS, Sheriff

Carlie Childers D.
Lois E. Brantley

GLADYS WATERS,

Plaintiff,

vs.

JOE PAUL JONES,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 7065

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

ALICE J. DUCK, 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

GLADYS WATERS,

Plaintiff,

VS.

JOE PAUL JONES,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 7065

* * * * *

DEMURRER

* * * * *

CHASON, STONE & CHASON

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