

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 Joyce Amos.

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

Alice J. Luck
Clerk

JOYCE AMOS,

Plaintiff,

Vs.

JOE PAUL JONES,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

7067

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; her back was hurt; she was caused to lose time from her work and expended great sums of money in and about the treatment of her injuries, hospital and doctor bills; Plaintiff avers that she is permanently injured, all to the loss of the Plaintiff in the aforesaid amount.

WILTEBS & BRANTLEY

BY:

William M. Brantley
Attorney for the Plaintiff

Defendant's Address:
Georgiana, Alabama

338 Plaintiff demands a trial by jury.

Entered - 7-28-66
Taylor - W. L. - 5-11-66
By C. Childers - 1-15-66

FILED

JUL 19 1966

1000

JOYCE AMOS,

Plaintiff,

vs:

JOE PAUL JONES,

Defendant

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. X-7067

RECEIVED

JUL 19 1966

TAYLOR WILKINS
SHERIFF

64
64
Ten Copies of this Summons and Complaint
TAYLOR WILKINS, Sheriff
BY Carole Chedden
DEPUTY SHERIFF

Received _____ day of _____
d on 28 day of July 1966
served a copy of the within
Joe Paul Jones

service on
TAYLOR WILKINS, Sheriff
Carole Chedden
Emil E Rosinton

JOYCE AMOS,

Plaintiff,

vs.

JOE PAUL JONES,

Defendant.

X

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

X

AT LAW, CASE NO. 7067

X

X

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

JOE 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

JOYCE AMOS,

Plaintiff,

vs.

JOE PAUL JONES,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, CASE NO. 7067

* * * * *

DEMURRER

* * * * *

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