STATE OF ALABAMA BALDWIN COUNTY

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Defendant's Address: Georgiana, Alabama.

Executed 7-2.8-46

Jugeor Wilkinsshe

C. Childred - 48.9

AUEL DUN SAS

# 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.

WITNESS m	y hand, this	$\frac{19}{\text{day of}}$	July, 1966. L. Damages
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FOYE WATERS,		X	
294 	Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.		X	BALDWIN COUNTY, ALABAMA
JOE PAUL JONES	,		AT LAW
	Defendant.	X	7068

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 was traveling upon or along U. S. Highway #90, a public highway in Baldwin County, Alabama, at a point in Loxley, Alabama, at or near the point said highway intersects the Daphne-Rosington Road. At said time and place, the Defendant so negligently operated his motor vehicle as to cause or allow it to run into the automobile owned by the Plaintiff. As a direct proximate consequence and result of said negligence, the Plaintiff's automobile was damaged so as to render it worthless, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS & BRANTLEY

BY: for Attorney the Plaintiff

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Blaintiff demands a trial by jury.



	FOYE WATERS,	X
and an	Plaintiff,	X
776	vs.	X IN THE CIRCUIT COURT OF
	vs.	X BALDWIN COUNTY, ALABAMA
	JOE PAUL JONES,	X AT LAW, CASE NO. 7068
	Defendant.	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:

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

CHASON, STONE & CHASON

Earle Chase

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AUG 91 1996 ALICE I. DUCK, CLERAN 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 2 day

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# FOYE WATERS,

Plaintiff,

vs.

JOE PAUL JONES,

Defendant.

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IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW, CASE NO. 7068

## DEMURRER

CHASON, STONE & CHASON Attorneys At Law P. O. Box 120 BAY MINETTE, ALABAMA

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