

HARRY J. WILTERS, JR.
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PHYLLIS S. NESBIT

LAW OFFICES OF
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August 29, 1966

Mrs. Alice J. Duck
Register
Bay Minette, Alabama

Dear Alice:

Please file enclosed Summons and Complaint for
me.

Sincerely yours,

WILTERS, BRANTLEY & NESBIT

By: 
(Mrs.) Phyllis S. Nesbit

PSN:fp
Enclosure

MARY SUE COHRON, by her
father and next friend
WILLIAM N. COHRON, JR.

PLAINTIFF

VS

GREYHOUND CORPORATION, a
Corporation and AL NOLAN,
an individual,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7150

1.

The Plaintiff claims of the Defendants the sum of FIVE HUNDRED DOLLARS (\$500.00) for that, heretofore, on to-wit, September 7, 1965, the Defendant, Greyhound Corporation, was operating buses between Mobile, Alabama and Robertsdale, Alabama, and other points, and as such was a common carrier of passengers for hire or reward. Plaintiff avers that on, to-wit, September 7, 1965, she bought a ticket at the office of the Greyhound Corporation in Mobile, Alabama, for Robertsdale, Alabama, and as such became a passenger upon one of the Greyhound Corporation's buses. Plaintiff further avers that when the said bus upon which she was riding as a passenger, reached Robertsdale, Alabama, her destination, that Al Nolan, Defendant's agent, servant or employee and who was then and there acting within the line and scope of his employment, negligently failed to be at his station at the door of the bus to assist passengers as they got off of the bus, and because of the negligence of such agent, servant, or employee, in failing to provide the necessary assistance, she fell from the bus to the ground. As a proximate consequence of the negligence of the agent, servant, or employee, of the Greyhound Corporation, the Plaintiff suffered a severe foot sprain that required casting and will necessitate the Plaintiff's wearing a special built shoe for the rest of her life and she has suffered great mental and physical pain, vexation and annoyance, all to her damage as aforesaid for which she sues.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 22 day of August 1966 served a copy of the foregoing pleading on counsel to all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Hyppolite S. Nesbit

WILTERS, BRANTLEY & NESBIT

By: Hyppolite S. Nesbit

Attorney for Plaintiff

FILED

AUG 30 1966

146

CLERK
REGISTER

NO. 7158

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

MARY SUE COHRON, by her
father and next friend
WILLIAM N. COHRON, JR.

PLAINTIFF

VS

GREYHOUND CORPORATION, a
corporation and AL NOLAN,
an individual,

DEFENDANTS

SUMMONS AND COMPLAINT

FILED

AUG 30 1963

AUG 1 1963

Walters, Brantley & Nesbit
Robertsdale, Alabama

Plaintiff's attorney

Chason, Stone & Chason,
Bay Minette, Alabama

Defendant's attorney

MARY SUE COHRON, by her	X	
father and next friend,		
WILLIAM N. COHRON, JR.,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
GREYHOUND CORPORATION, a	X	AT LAW
corporation, and AL NOLAN,		
an individual,	X	
Defendants.	X	

PLEA

Come now the Defendants in the above styled cause, separately and severally, by and through their Attorneys of Record, and for Plea to the Complaint heretofore filed against them say, separately and severally, as follows:

1. Not guilty.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Defendants.

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 _____ day of September, 1966.

John E. Chason

FILED

SEP 1966

MADE L. DAVIS, CLERK