

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY
ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING
PHONE 433-5561 P. O. BOX 1988
MOBILE, ALABAMA 36601

C. A. L. JOHNSTONE, JR.
R. F. ADAMS, SR.
JAMES L. MAY, JR.
ALEX T. HOWARD, JR.
J. JEPHTHA HILL
CHARLES B. BAILEY, JR.
C. M. A. ROGERS, III
BROCK B. GORDON
BEN H. HARRIS, JR.
WILLIAM H. HARDIE, JR.
DOUGLAS INGE JOHNSTONE

November 20, 1967

GESSNER T. MCCORVEY (1882-1965)
BEN D. TURNER, OF COUNSEL

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: J. K. Hughes vs. Mrs. E. Lamar Little
Circuit Court of Baldwin County Case No. 7412

Dear Mrs. Duck:

We have reached a settlement agreement with Mr. Brantley in the above case and our client is to pay the court costs. I will appreciate your letting me know what the court costs will be in this case. It will be dismissed. Thank you very much.

Yours very truly,

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Ben H. Harris, Jr.
Ben H. Harris, Jr.

BHHjr:dk

cc: Mr. Tolbert M. Brantley
Attorney at Law
P. O. Box 968
Bay Minette, Alabama

Done
11-21-67

HARRY J. WILTERS, JR.
TOLBERT M. BRANTLEY

LAW OFFICES OF
WILTERS & BRANTLEY

P. O. BOX 968
BAY MINETTE, ALABAMA
36507

PHONE
BAY MINETTE 937-5533

January 30, 1968

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

7412

Dear Mrs. Duck,

Please dismiss the case of J. K. Hughes vs. E. Lamar Little and send the costs bill to Ben H. Harris, Jr. at JOHNSTONE, ADAMS, MAY, HOWARD & HILL, Attorneys at Law, P. O. Box 1988, Mobile, Alabama, 36601.

Yours truly,


Tolbert M. Brantley

TMB/jcw
cc Ben H. Harris, Jr.
Mobile, Alabama

J. K. HUGHES, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
vs. : AT LAW
MRS. E. LAMAR LITTLE, : CASE NO. 7412
Defendant. :

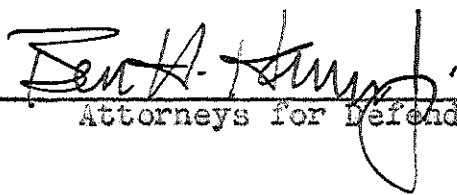
D E M U R R E R

Comes now the defendant in the above styled cause and demurs to the amended complaint in the above styled cause and as grounds therefor sets forth the following joint and separate grounds:

1. From aught that appears there was no duty owing from this defendant to the plaintiff at the time and place complained of in the complaint.
2. From aught that appears the defendant was not operating a motor vehicle on a public street.
3. From aught that appears the defendant did not proximately cause the automobile being driven by Mrs. Ruth Faulk to collide with the automobile owned by the plaintiff.
4. From aught that appears the automobile of the plaintiff was not on a public street.

McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By



Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29th day of May, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

J. K. HUGHES, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
vs. : AT LAW
MRS. E. LAMAR LITTLE, : CASE NO. 7412
Defendant. :

D E M U R R E R

Comes now the defendant in the above styled cause and demurs to the amended complaint in the above styled cause and as grounds therefor sets forth the following joint and separate grounds:

1. From aught that appears there was no duty owing from this defendant to the plaintiff at the time and place complained of in the complaint.

2. From aught that appears the defendant was not operating a motor vehicle on a public street.

3. From aught that appears the defendant did not proximately cause the automobile being driven by Mrs. Ruth Faulk to collide with the automobile owned by the plaintiff.

4. From aught that appears the automobile of the plaintiff was not on a public street.

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Ben H. Harris
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29th day of May, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

J. K. HUGHES, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
vs. : AT LAW
MRS. E. LAMAR LITTLE, : CASE NO. 7412
Defendant. :

D E M U R R E R

Comes now the defendant in the above styled cause and demurs to the complaint heretofore filed and sets forth the following joint and separate grounds:

1. For that it affirmatively appears that J. K. Hughes is not a party to this suit.
2. For that it affirmatively appears that the negligence complained of was the plaintiff's own negligence.
3. For that it affirmatively appears that the damages complained of was the proximate result of the plaintiff's own negligence.

McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By B. H. Harris Jr.
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 16th day of May, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

The front end of said automobile was torn, bent and crumpled, all to the loss of the Plaintiff in the aforesaid amount.

Hugh Rozelle
Hugh Rozelle
Atmore, Alabama

WILTERS & BRANTLEY

BY:

Tolbert M. Brantley
Tolbert M. Brantley

The Defendant can be served at
Box 236, Gulf Shores, Alabama

FILED

MAR 14 1967

ALICE L. DICK, CLERK
REGISTERS

7412

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

J. K. HUGHES

PLAINTIFF

VS.

MRS. E. LAMAR LITTLE

DEFENDANT

SUMMONS AND COMPLAINT

WILTERS & BRANTLEY
Attorneys at Law
Bay Minette, Alabama

FILED

MAR 14 1907

ALICE L. BIRD, CLERK
REGISTER

Received 14 day of March 1907
and on 15 day of March 1907
served a copy of the within etc.
on Mrs. E. Lamar Little

My service on

TAYLOR WILKINS, Sheriff

By Charles Childers D. S.

Sheriff claims 72

For Costs per mile 7.20

TAYLOR WILKINS, Sheriff

BY Charles Childers
DEPUTY SHERIFF

J. K. HUGHES, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
vs. : AT LAW
MRS. E. LAMAR LITTLE, : CASE NO. 7412
Defendant. :

D E M U R R E R

Comes now the defendant in the above styled cause and demurs to the complaint heretofore filed and sets forth the following joint and separate grounds:

1. For that it affirmatively appears that J. K. Hughes is not a party to this suit.

2. For that it affirmatively appears that the negligence complained of was the plaintiff's own negligence.

3. For that it affirmatively appears that the damages complained of was the proximate result of the plaintiff's own negligence.

McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By John H. Harris, Jr.
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 16th day of May, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

John H. Harris, Jr.

FILED
MAY 17 1967
CLERK
BALDWIN COUNTY

AMENDED COMPLAINT

J. K. HUGHES,)	
)	IN THE CIRCUIT COURT OF
PLAINTIFF,)	
)	BALDWIN COUNTY, ALABAMA
VS.)	
)	AT LAW
MRS. E. LAMAR LITTLE,)	
)	CASE NO. _____
DEFENDANT.)	

Comes now the Plaintiff in the above styled cause and amends his Complaint to read as follows:

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED AND FIFTY DOLLARS (\$550.00) as damages and that heretofore, on to-wit: the 15th day of March, 1966, the Defendant so negligently operated her motor vehicle in the city of Pensacola, Escambia County, Florida, at the intersection of Gregory and Baylen Streets as to cause the same to collide with a motor vehicle being driven by Mrs. Ruth Faulk causing the automobile being driven by the said Mrs. Ruth Faulk to collide with the automobile owned by the Plaintiff, J. K. Hughes. As a direct and proximate consequence and result of said negligence, the Plaintiff's automobile was damaged as follows: The left rear fender was crumpled and bent. The rear bumper was crumpled and torn. The tail lights were knocked out. The entire car was knocked out of line. The paint on the entire car was scratched and flaked. The front end of said automobile was torn, bent and crumpled, all to the loss of the Plaintiff in the aforesaid amount.

Hugh Ozelle

Hugh Ozelle
Atmore, Alabama

WILLIERS & BRANTLEY

BY: *Tolbert M. Brantley*

Tolbert M. Brantley

The Defendant can be served at
Box 236, Gulf Shores, Alabama

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 17 day of May 1967 served a copy of the foregoing complaint on and for all parties to this proceeding by United States Mail, properly addressed, and that the same is being deposited.

WILLIERS & BRANTLEY
By: *Tolbert M. Brantley*

FILED
MAY 22 1967

ALICE L. MOORE, CLERK
CLERK OF DISTRICT COURT

J. K. HUGHES, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
vs. : AT LAW
MRS. E. LAMAR LITTLE, : CASE NO. 7412
Defendant. :

D E M U R R E R

Comes now the defendant in the above styled cause and demurs to the amended complaint in the above styled cause and as grounds therefor sets forth the following joint and separate grounds:

1. From aught that appears there was no duty owing from this defendant to the plaintiff at the time and place complained of in the complaint.
2. From aught that appears the defendant was not operating a motor vehicle on a public street.
3. From aught that appears the defendant did not proximately cause the automobile being driven by Mrs. Ruth Faulk to collide with the automobile owned by the plaintiff.
4. From aught that appears the automobile of the plaintiff was not on a public street.

McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Ben H. Hamer
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29th day of May, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

Ben H. Hamer