

JOHN LEE,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

vs.

X

AT LAW

NO. 7522

LUMON A. ANGLIN,

X

Defendant.

DEMURRER TO PLEA

Comes now the Plaintiff in the above styled cause, by his attorneys, and demurs to Plea "2." heretofore filed by the Defendant and assigns the following separate and several grounds in support thereof:

1. Said Plea does not constitute a defense to the complaint heretofore filed against the Defendant in this cause.
2. Said Plea is immaterial.
3. The statute of limitations of one year is inapplicable to a suit for wilfull and wanton injury.

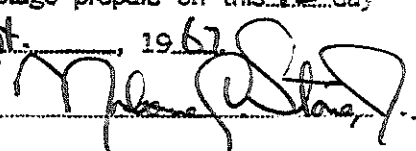
Respectfully submitted,

CHASON, STONE & CHASON

By: 

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 17 day of Sept., 1967.



FILED

SEP 19 1967

ALICE J. DUCK CLERK
REGISTER

JOHN LEE,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
LUMON A. ANGLIN,)	AT LAW
)	NO. 7522
Defendant.)	

AMENDED PLEA

Now comes the defendant in the above styled cause and amends the plea heretofore filed in said cause so that, as amended the said plea will read as follows:

"Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof says, separately and severally:

1. Not guilty.
2. The defendant for answer to the complaint says that the cause of action is barred by the statute of limitations of one year."

J. B. BLACKBURN and
JAMES R. OWEN

By 

Attorneys for Defendant.

FILED

SEP 6 1967

ALICE J. DICK

CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 7522

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause says:

1. Not guilty.

J. B. BLACKBURN and
JAMES R. OWEN

By [Signature]
Attorneys for Defendant

FILED

JAN 1 1967

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 08-22-2001 BY 60322 UCBAW

STATE OF ALABAMA


IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Lumon A. Anglin 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 same, then and there to answer the Complaint of John Lee.

Witness my hand this 16 day of May, 1967.


Clerk

JOHN LEE,

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

LUMON A. ANGLIN,

X

AT LAW

Defendant

X

7522

COUNT ONE:

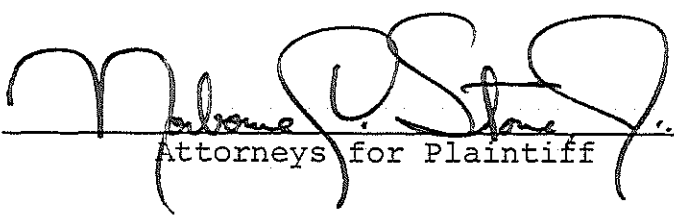
The Plaintiff claims of the Defendant Twenty Thousand Dollars (\$20,000) as damages for that on heretofore, to-wit; the 28th day of February, 1966, on U. S. Highway No. 90 at a point 2.4 miles East of the city limits of Robertsedale in Baldwin County, Alabama, the Defendant willfully and wantonly injured the Plaintiff by then and there willfully and wantonly operating a motor vehicle so as to cause it to run into, upon and against a motor vehicle owned by and being then and there operated by the Plaintiff; and as a proximate consequence and result of the willful and wanton misconduct of the Defendant aforesaid, the Plaintiff was willfully and wantonly injured and damaged in this: He suffered severe cuts

and bruises about his head and face, he suffered a severe bruise and strain to his neck and back, he suffered great pain and mental anguish, he was knocked unconscious, his motor vehicle was rendered a total loss, he lost time from his work, he was caused to incur and did incur medical, hospital and ambulance bills; all to his damage aforesaid, wherefore he brings this suit and asks judgment in the above amount.

Respectfully submitted,

CHASON, STONE & CHASON

By:


Attorneys for Plaintiff

Plaintiff respectfully demands
a trial of this case by a jury.

CHASON, STONE & CHASON

By:


Attorneys for Plaintiff

FILED

MAY 16 1937

ALICE L. MOORE, CLERK
REGISTER

Gibbs
7522
JOHN LEE,

Plaintiff

VS *18 x Gibbs*

LUMON A. ANGLIN,

Defendant

Received 18 day of May 1967
and on 18 day of May 1967 * * * * *

I served a copy of the within &c
on Lumon A. Anglin

By service on _____

Raydo Bridges
TAYLOR WILKINS, Sheriff

By J. Gibbs D. S.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED
MAY 16 1967
WILLIAM A. RUCK, CLERK
REGISTER

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

RECORDED & INDEXED
MAY 16 1967
BAY MINETTE, ALA.