

CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA 36507

JOHN CHASON  
NORBORNE C. STONE, JR.  
JOHN EARLE CHASON

TELEPHONE 937-2191

March 27, 1968

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

Dear Mrs. Duck:

Re: White vs. Hayles  
Case No. 7546

The above matter has been settled between the parties and we would appreciate it very much if you would forward to us your cost bill in the above matter.

As soon as we have received the cost bill from you, we will forward the same to our client and request payment.

With best regards, we are

Sincerely,

CHASON, STONE & CHASON

By: 

NCS:jb

CC: Alabama Farm Bureau Insurance Company  
2108 East South Boulevard  
Montgomery, Alabama 36106

OPAL WHITE,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	AT LAW
		NO. 7546
IRENE H. HAYLES,	X	
Defendant.	X	

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the separate and several grounds as follows:

1. That said complaint does not state a cause of action.
2. The allegation that the Defendant negligently operated her motor vehicle along or upon Alabama Highway #59 is vague and indefinite in that such allegation does not state that the accident occurred upon such highway.
3. The said complaint does not allege any duty owing by the Defendant to the Plaintiff.
4. That said complaint fails to state who was driving the Plaintiff's automobile at the time of the accident.
5. That said complaint does not state the particulars as to the damage to Plaintiff's automobile.

*Barney Stone & Chason*  
Attorneys for Defendant

Defendant demands a trial of this cause by a jury.

*Barney Stone & Chason*  
Attorneys for Defendant

FILED

JUN 19 1967

ALICE A. HICK, CLERK  
REGISTERED

075

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 19 day

of June, 1967  
*John H. Hannon*

OPAL WHITE,

Plaintiff,

vs.

IRENE H. HAYLES,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7546

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

FILED

JUN 19 1967

AUNE A. DICK, CLERK  
REGISTERED

OPAL WHITE,

Plaintiff,

vs.

IRENE H. HAYLES,

Defendant.

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

X

AT LAW

X

CASE NO. 7546

X

PLEAS:

Comes the Defendant in the above styled cause and for plea to the amended complaint filed in said cause, separately and severally says:

1. Not guilty.

2. That at the time and place as set out in such amended complaint, the Plaintiff, acting by and through her agent, servant or employee, who was then and there acting within the line and scope of her authority as such was herself guilty of negligence which was the proximate cause of the Plaintiff's injury and damages, hence she cannot recover in this suit.

*Shaw, Stone & Shaw*  
Attorneys for Defendant

FILED

SEP 5 1967

ALICE J. BICK CLERK  
REGISTER

7546

PLEAS:

OPAL WHITE,

Plaintiff,

vs.

IRENE H. HAYLES,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7546

FILED

SEP 5 1967

AMBER L. BOWEN  
CLERK U. S. COURT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Irene H. Hayles 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 Opal White.

WITNESS my hand this 1st day of June, 1967.

Alice L. Black  
Clerk

OPAL WHITE,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
IRENE H. HAYLES,	)	AT LAW
Defendant.	)	CASE NO. <u>7546</u>

1.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND DOLLARS (\$1,000.00) as damages for that heretofore on to-wit: April 8, 1967, the Defendant so negligently operated her motor vehicle along or upon Alabama Highway #59 at a point about four and one half (4 1/2) miles North of Stockton, Baldwin County, Alabama, so as to cause or allow her vehicle to run into or against the automobile owned by the Plaintiff; and as a direct and proximate consequence and result of said negligence, the Plaintiff's automobile was damaged as follows: said car was bent, crushed and broken and rendered less valuable, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS & BRANTLEY

BY: Tolbert M. Brantley

Tolbert M. Brantley

The Defendant can be served at  
Route 2, Box 180, Uriah, Alabama.

FILED

JUN 1 1967

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ALICE L. BLACK, CLERK  
RECORDED

RECEIVED

JUN 1 1967

TAYLOR WILKINS  
CLERK

OPAL WHITE,  
Plaintiff,

VS.

IRENE H. HAYLES,  
Defendant.

CASE NO. 7546

FILED  
JUN 1 1967

ALICE J. DICK, CLERK

SUMMONS AND COMPLAINT

Wilters & Brantley  
Attorneys at Law  
Bay Minette, Alabama

Received this 13th day of June 1967  
by serving a copy of  
the within on Irene H.  
Hayles.  
By W. A. Watson Sheriff  
Bay Minette

70 miles

074

AMENDED COMPLAINT

OPAL WHITE,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
VS.	)	AT LAW
IRENE H. HAYLES,	)	CASE NO. 7546
Defendant.	)	

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

1.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND DOLLARS (\$1,000.00) as damages for that heretofore on to-wit: April 8, 1967, the Defendant so negligently operated her motor vehicle upon Alabama Highway #59 at a point about four and one half (4 1/2) miles North of Stockton, Baldwin County, Alabama, so as to cause or allow her vehicle to run into or against the automobile owned by the Plaintiff; and as a direct and proximate consequence and result of said negligence, the Plaintiff's automobile was damaged as follows: said automobile was bent, crushed and broken; the paint was scratched chipped and marred. The said automobile was knocked out of line; the transmission was bent and broken. The following parts on said automobile were bent, twisted and broken: rear bumper face bar, all the rear bumper supports, upper and lower rear end panels, left rear quarter, gas tank, trailer hitch, floor pan, rear panel extension, deck lid, door hinges, deck lid lock and right quarter panel, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS & BRANTLEY

BY: \_\_\_\_\_

Tolbert M. Brantley

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 31 day of Aug, 1967 served a copy of the foregoing pleading in counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

BY: \_\_\_\_\_

**FILED**

AUG 31 1967

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ALICE J. BUSH

CLERK  
REGISTER