

WILLIAM SIGLER,

Plaintiff,

VS.

MARGARET G. DYESS,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7568

DEMURRERS

Comes now the Defendant and files the following Demurrers to the Plaintiff's Complaint:

1.

This Bill of Complaint fails to show whether this accident occurred on public or private property.

2.

This Bill of Complaint fails to show what county and state this accident occurred in.

WILTERS & BRANTLEY

BY:

Seamus M Brantley
Attorney for Defendant

The Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY:

Seamus M Brantley
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 16 day of June 1967 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Registered Mail, postage prepaid.

WILTERS & BRANTLEY

Seamus M Brantley

FILED

JUN 16 1967

AMEL DICK, CLERK
REGISTER

WILLIAM SIGLER,
Plaintiff,

Vs.

MARGARET G. DYESS,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 7568

DEMURRERS

WILTERS & BRANTLEY
Attorneys at Law
Bay Minette
Alabama

FILED

JUN 16 1967

ALICE J. BUCK, CLERK
REGISTER

STATE OF ALABAMA

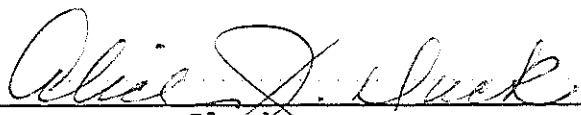
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Margaret G. Dyess 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 William Sigler.

Witness my hand this 13th day of June, 1967.


Clerk

WILLIAM SIGLER,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

X

MARGARET G. DYESS,

X

AT LAW

Defendant.


X

7568

COUNT ONE:

The Plaintiff claims of the Defendant Five Thousand Dollars (\$5,000.00) as damages for that on, to-wit: June 17, 1966, on U. S. Highway 31 at a point about one mile South of the City Limits of Bay Minette, Alabama, the Defendant negligently drove an automobile into or against an automobile owned by the Plaintiff which he was then and there driving and as a proximate result of the negligence of such Defendant the Plaintiff was injured in this: he received severe lacerations of the lip, mouth and nose and five of his lower teeth were knocked out or broken so that they had to be extracted; five of his upper teeth were cracked; he received

bruises to his chest, arms and legs; he suffered severe pain and mental anguish; he was caused to incur medical and hospital expenses and loss of time from his employment and his automobile was demolished, all to the damage to the Plaintiff in the above amount, hence this suit.


Attorneys for Plaintiff

FILED

JUN 18 1967

ALICE J. DICK, CLERK
REGISTERED

Served 13 day of June 1967
and on 14 day of June 1967
I served a copy of the within ATC
on Margaret G. Dyess
service on _____

TAYLOR WILKINS, Sheriff
By W D Talbert D. C.
W

756P

WILLIAM SIGLER,
Plaintiff,

vs.

MARGARET G. DYESS,
Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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SUMMONS AND COMPLAINT

* * * * *

FILED
JUN 13 1967

ALICE L. DICK CLERK
CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA