are constituted at	ANDY DAVIS BROWN,	X	
	Plaintiff,	X	IN THE CIRCUIT COURT OF
	TIC	X	BALDWIN COUNTY, ALABAMA
	vs.	X	AT LAW NO: 7663
	ALONZO CRISWELL,	χ	
	Defendant.	X	

### PLEA:

Comes now the Defendant in the above styled cause, by his attorneys, and for answer to the Complaint heretofore filed against him and to each Count thereof, separately and severally, pleads as follows:

1. Not guilty.

CHASON, STONE & CHASON

Attorneys for Defendant

#### 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 26 day

196

JUN 26 1968

ALGE J. DUGK CLERK PEGISTED

ANDY I	DAVIS	BROWN,	χ					
Andrews (Brown Carriers		Plaintiff,	χ	IN	THE	CIRCU	T COU	RT OF
			χ	בא כם	ፓን <i>ፕ</i> ልፖ ፓፖ እ	COTINTE	āsz ar	<b>ን ፓን</b> ን <b>አ</b> ፈንን
7 - A.A.	vs.		X	DAL	DMTIV	COUNT	LY, AL.	ABAMA
			χ	AT :	LAW		NO.	7663
ALONZO	CRIS	SWELL,	χ					
		Defendant.	χ					

## DEMURRER:

Comes now the Defendant in the above styled cause, by his attorneys, and demurs to the Complaint heretofore filed against him and to each count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. The Complaint fails to state a cause of action.

Respectfully submitted, CHASON, STONE & CHASON

Attorneys for Defendant

The Defendant demands a trial of this cause by jury.

CHASON, STONE & CHASON

SEP 5 1967

E. Oliver MIRE J. BIRK REGISTER

ANDY DAVIS BROWN,	X		
Plaintiff,	χ	IN THE CIRC	CUIT COURT OF
	χ	PATDWIN COL	MMV ATARAMA
vs.	X	DALIDWIN COC	JNTY, ALABAMA
ALONZO CRISWELL,	X	AT LAW	NO. 7663
Defendant.	χ		

#### DEMURRER

Comes now the Defendant in the above styled cause, by his attorneys, and demurs to the Complaint heretofore filed against him and to each count thereof, separately and severally, and in support thereof assigns, separately and severally, the following:

1. The Complaint fails to state a cause of action.

Respectfully submitted,
CHASON, STONE & CHASON

By: Attorneys for Defendant

The Defendant demands a trial by a jury.

CHASON, STONE & CHASON

By: Attorneys for Defendant

# CERTIFICATE OF SERVICE

l certify that a copy of the foregoing pleading has been served upon counts for all parties to this proceeding, the mailing the same to each by First Close United States Mail, properly addressed and postage prepaid on this 2.3...da.

of Argust 1967.

FLED

AUG 23 1967

ALIGE J. DUGN CLERK REGISTER ANDY DAVIS BROWN,

Plaintiff,

vs.

ALONZ O CRISWELL,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7663

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The state of the s

AUG 23 1967

ALCE J. DUM CLERK REGISTER

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

America, Frank, Princer, Stepleton 2. Tindall, Horace A., Farmer, Gulf Shores Day, Warren W., Civil Service Elberta Day, Warren W., Creation Bay Minette fordazzari, Anglo, Farmer, Belicussi 6. Allen, Norman W., Farmer, Gateswood - Yelding, Bailey, St., Carpenter & Bricklayer, Dapine 8. Graham, James R., Laborer, Bay Minette 10. Williams, Samuel D., Gov't.Employee, Fairhope
12. Fletcher, Charles T., Gov't. Employee, Bay Minette 12. Gamble, I. Jack, Salesman, Bay Minette 2. Carrett, Malcolm, Farmer, Bulforest Underwood, Mechanic, Foley T5 Weatherford, Arthur C., Newport, Bay Minette T6: Harrison; Bibb, Larrer, Eaithope 17 Herry, J. W., Salesman, Fallhope 48- Hinterfighter, Daniel C., Clerk, Bay Minette 19 Czin, Hurmer II., Mechanic, Bey Mineste Admission-ban, Donald-Respondence Meg. Spgor 21 Cabiness, Marvin, Laborer, Bay Minette 22 Larson, Henry L., Brick Layer, Elberta 23-, Matthews, Reid, Runninure Stone Open- Robertsdale 24. McKenzie, Robert E., Meat Packer, Fairhope 25\_Mitchel, Fred, Gr., Service Station, Stapleton 26-Mund, Andrews Tisherman, Guif Shores 27. Osborne, W. Á., Civll Service, Foley 28. Pierce, Arthur, Insurance, Pairhope 29- Rayborn, Cecil, Farm Laborer Robertsdale -300 Cremons, Frank, Grand Hotel, Fairhope <del>ôl-Bor</del>os, Anthony Japan Berner, Liberte - 32 mBurkhard: \_\_\_John M\_\_\_\_\_Barner, \_\_\_HHbertz 33.\_Allen,\_Leslie\_Sr\_,\_\_Clerk,~~Fairhope~ 200 Allen, James Bry Jaryo Estmer Lillian <del>Of. Jones, George, Business-Operator, Daphnes</del> 3660 Wenzel, Empete O., Merchant, Gulfs Shores 37. Clemmons, W. P., Carpenter, Fairhope

XXXXX X

XXXXX X

ANDY DAVIS BROWN

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Plaintiff

I IN THE CIRCUIT COURT OF

VS

I BALDWIN COUNTY, ALABAMA

ALONZO CRISWELL

Ĭ

AT LAW

Defendant

ğ

NO. 7663

l.

The Plaintiff claims of the Defendant FIFTEEN THOUSAND (\$15,000.00) DOLLARS, damages for an assault and battery committed by the Defendant on the Plaintiff, wiz: on the 7th day of January, 1967.

2.

The Plaintiff claims of the Defendant FIFTEEN THOUSAND (\$15,000.00) DOLLARS, damages for an assault and battery committed by the Defendant on the Plaintiff, viz: on the 7th day of January, 1967 and as a proximate result of said assault and battery, committed upon him by the said defendant, he was caused to be confined in a hospital for, to-wit: 42 days, incurring hospital, doctor, medical and drug bills in the amount of, to-wit: FOUR THOUSAND FIVE HUNDRED (\$4,500.00) DOLLARS and cause to suffer pain and mental anguish.

3.

The Plaintiff claims of the Defendant FIFTEEN THOUSAND (\$15,000.00) DOLLARS, damages for an assault and battery committed by the defendant on the plaintiff by shooting him with a shot gun on: viz: the 7th day of January, 1967.

WILLERS, BRANTLEY AND NESBIT
BY:

AUG 3 1967

ALIE J. DIEW REDISTER

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The Plaintiff of the order of the referre transmit and battery comists, 00 1401) collect, depages for an escable and battery committed by the Defendent on the Plaintiff, wine on the Pin day
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caused to be confined to a localing the said defeator. The valcarrendent of, co--its and the localing profit and saying to a localing the profit of the said and matter of any said.

We the Juny find for the Plaintiff and assess his damage in the amount of \$4,500.00

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	ne Circuit	Court	of Baldw	mur, with	hin this	rty day	abama,	at		inette,	agai	nst	endel
	ne Circuit	Court	of Baldw	mur, with	hin this	rty day	abama,	at	Bay M	inette,	agai	nst , De	endel

Et: 8-7-67

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12663 H360 No. 7663 Page	
STATE OF ALABAMA  Baldwin County	Defendant lives at  Route 2  Theodore, Alabama
CIRCUIT COURT	Received In Office
Andy Davis Brown	AUG. 3. 196719
Plaintiffs	I have executed this summons
7 Jail Cos.	this aring
Alonzo Criswell Defendants	by leaving a copy with
SUMMONS AND COMPLAINT	alongo Crisivell
Filed 19	
ДЦБ	
CLERK REGISTER	
Wilters, and Brantley Plaintiff's Attorney	JA Ray & Brudge Sheriff
Defendant's Attorney	Julia Deputy Sheriff