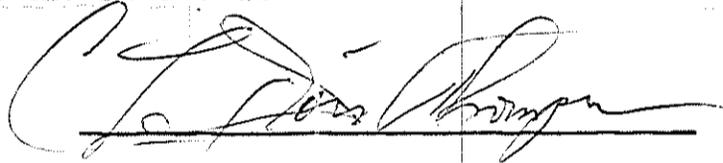




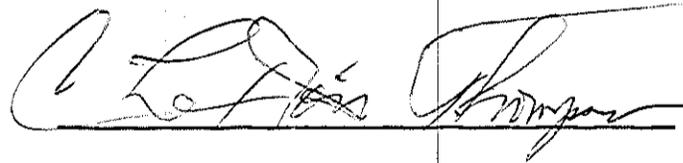
HAROLD A. MAYNARD	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
vs	X	BALDWIN COUNTY, ALABAMA	
MRS. RAYMOND DILL and RAYMOND DILL	X	AT LAW	NO. 7767
Defendants	X		

Come the defendants and demur to the complaint filed in said cause and for demurrer to said complaint show unto this Honorable Court as follows:

1. Said complaint fails to state a cause of action.
2. Said plaintiff fails to allege that he operated his car at a point or place on said highway where he had a right to be.
3. That said complaint combines personal injuries and property damages in the same count.



I hereby certify that I have this 21 day of October, 1967, served a copy of the foregoing on Honorable Norborne Stone, Attorney for plaintiff, by mailing copy of same postage prepaid to his office in Bay Minette, Alabama.



FILED

OCT 21 1967

ALICE J. DUCK CLERK REGISTER

HAROLD A. MAYNARD	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
VS	X	BALDWIN COUNTY, ALABAMA	
MRS. RAYMOND DILL and RAYMOND DILL	X	AT LAW	NO. 7767
Defendants	X		
	X		

Come the defendants in the above styled cause and propound the following interrogatories to Harold A. Maynard:

1. State your name.
2. Are you the Harold A. Maynard involved in an accident on the 3rd day of September, 1967, in Baldwin County, Alabama?
3. If so, on what highway in Baldwin County did this accident happen and at what distance from an incorporated town?
4. State in which direction you were going, whether East or West or North or South?
5. State in which direction the car with which you collided was going?
6. Were you meeting or passing?
7. At what point on the highway did the collision occur, in the middle or on the side of the road?
8. On which side of the road did the collision occur?
9. Itemize the damages to the automobile operated by you.
10. In which hospital were you treated and how long did you remain in that hospital?
11. State the name of your doctor.
12. Are you willing for your doctor to make a statement as to his examination, findings and treatment of your condition which you have stated was caused by this wreck?

  
 \_\_\_\_\_  
 Attorney for defendants.

FILED

OCT 21 1967

ALICE J. DUEK CLERK REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

Before me, theundersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson who being by me first duly sworn, deposes on oath and says as follows:

~~My name is C. LeNoir Thompson and I am the attorney of record for the defendants in the above entitled cause, and as such, I am authorized to make this affidavit. I further state the answer of Harold A. Maynard to the foregoing interrogatories will, if truthfully made, be material evidence for the defendants on the trial of said cause.~~

C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 21 day of October, 1967.

Helen McDowell  
Notary Public, Baldwin County, Alabama

Service of copy accepted this 21<sup>st</sup> day of October, 1967

Melvin P. Stone  
Attorney for Plaintiff

FILED

OCT 21 1967

ALICE J. BUSH CLERK

HAROLD A. MAYNARD,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

vs.

X

AT LAW

X

CASE NUMBER: 7767

MRS. RAYMOND DILL  
and RAYMOND DILL,

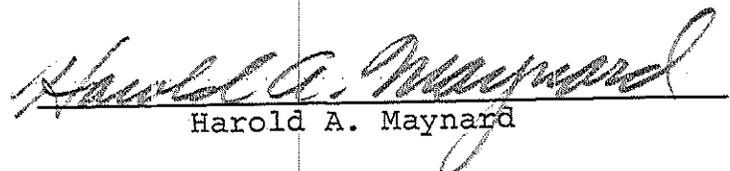
X

Defendants.

X

Comes the Plaintiff in the above styled cause and for answer to the interrogatories heretofore propounded to him says as follows:

1. Harold A. Maynard.
2. Yes.
3. I have been informed that the Baldwin County Highway Number is 48. I do not know how far the scene of the accident is from an incorporated town.
4. East.
5. West.
6. Meeting.
7. The accident occurred on the paved portion of the road and not on the "side" of the road.
8. About the middle of the road.
9. I do not know at this time all of the particular items of damage. I do know that the point of impact was at the right front corner of my car and that most of the damage was in the front area of my car plus a bent frame.
10. Thomas Hospital, Fairhope, Alabama, for 3 days.
11. T. H. Yancey, M.D.
12. Yes, on proper notice to me with an opportunity to be present through counsel.

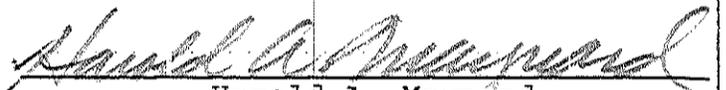
  
Harold A. Maynard

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Harold A. Maynard, who is known to me and who, after being by me first-duly and legally sworn, did depose and say under oath as follows:

That he signed the foregoing answers to interrogatories and the same are true and correct.

  
Harold A. Maynard

Sworn to and subscribed before me

on this the 15<sup>th</sup> day of

November, 1967.

  
Notary Public, Baldwin County, Alabama.

**FILED**

NOV 15 1967

**ALICE J. DUCK**

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 Mrs. Raymond Dill and Raymond Dill 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 Harold A. Maynard.

Witness my hand this 29<sup>th</sup> day of September, 1967.

*Alice J. Clenk*  
Clenk

HAROLD A. MAYNARD,

Ø

Plaintiff,

Ø

IN THE CIRCUIT COURT OF

vs.

Ø

BALDWIN COUNTY, ALABAMA

Ø

MRS. RAYMOND DILL and  
RAYMOND DILL,

Ø

AT LAW

Defendants.

Ø

7767

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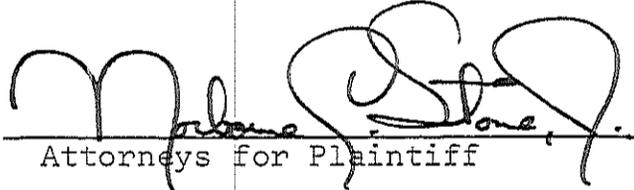
COUNT ONE

The Plaintiff claims of the Defendants Forty Thousand Dollars (\$40,000.00) as damages for that on, heretofore, to-wit: the 3rd day of September, 1967, the Defendant Mrs. Raymond Dill, who was then and there acting as the agent, servant or employee of the Defendant Raymond Dill and while acting within the line and scope of her employment as such so negligently operated an automobile on Baldwin County Highway No. 48 at a point four-tenths (.4) of a mile East of the Silverhill Community House in Baldwin

County, Alabama, a public highway in Baldwin County, Alabama, as to cause or allow the same to run into, upon and against an automobile being then and there operated by him and as a proximate consequence and result of the negligence of the Defendant Mrs. Raymond Dill, aforesaid, while acting within the line and scope of her employment as an agent, servant or employee of the Defendant Raymond Dill, the Plaintiff was damaged in this: the front end and right side of his automobile, the frame and front end assembly were bent, broken and damaged, he suffered a laceration to his head and scalp, he suffered a severe bruise to his abdominal area and bruises about his entire body, he was made sick, sore and lame, he was caused to be hospitalized and to incur hospital and medical bills, he suffered great mental pain and anguish and he was otherwise injured, all to his damage aforesaid, wherefore he brings this suit and asks judgment in the above amount.

CHASON, STONE & CHASON

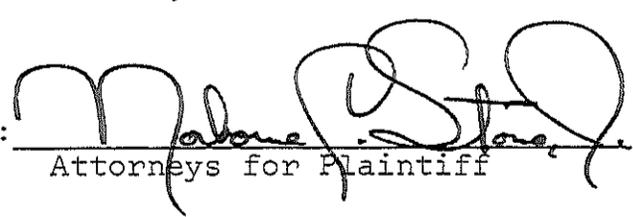
By:

  
Attorneys for Plaintiff

The Plaintiff demands a trial of this cause by a jury.

CHASON, STONE & CHASON

By:

  
Attorneys for Plaintiff

FILED

SEP 29 1967

ALICE J. DUCK

CLERK  
REGISTER

Defendants' address for service:

Silverhill, Alabama

7767

HAROLD A. MAYNARD,  
Plaintiff,

vs.

MRS. RAYMOND DILL and  
RAYMOND DILL,  
*Silverhill*  
Defendants.

Received 29 day of Sept 1967  
and on 7 day of Oct 1967  
I served a copy of the within S & C  
on Mrs Raymond Dill ;  
Raymond Dill  
by service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Carlisle Chidress  
*Silverhill*

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

\* \* \* \* \*

Sheriff claim 120 miles AS  
120 Cords per mile Total \$ 120.00  
TAYLOR WILKINS, Sheriff  
BY Carlisle Chidress  
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

**FILED**

\* \* \* \* \*

SEP 29 1967

**ALICE J. DUCK** CLERK  
REGISTER  
**CHASON, STONE & CHASON**  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA