

HAROLD L. WING, who sues
as the Father of CECILIA
WING, a minor,

Plaintiff,

vs.

LEONA WRIGHT NILES,

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

DEMURRER:

Comes the Defendant and demurs to the Complaint filed
in said cause and assigns the following separate and several
grounds, viz:

1. That said Complaint does not state a cause of
action.
2. That said Complaint does not allege that the Plain-
tiff was an occupant of either vehicle at the time of the acci-
dent.
3. That said Complaint is vague and indefinite.
4. That said Complaint does not state that the negli-
gence of the Defendant was the proximate cause of the Plaintiff's
injuries.
5. That said Complaint does not allege any duty owing
by the Defendant to the Plaintiff.

Craven, Stone & Craven
Attorneys for Defendant

Defendant demands a trial of this
cause by a jury.

Craven, Stone & Craven
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 20 day
of *Oct*, 19*67*

Blue

FILED

OCT 20 1967

529

CLERK
REGISTER

777 (

HAROLD L. WING, who sues as the
Father of CECILIA WING, a minor,

Plaintiff,

vs.

LEONA WRIGHT NILES,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

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DEMURRER

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FILED

OCT 20 1967

ALICE J. GIBSON
CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Leona Wright Niles

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

Leona Wright Niles

....., Defendant.....

by Harold L. Wing, who sues as the father
of Cecilia Wing, a minor

....., Plaintiff.....

Witness my hand this 29 day of Sept 1967

Cliff J. Smith Clerk

No. 7771 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Harold L. Wright
who sues as the father of
Cecilia Wright, a minor
Plaintiffs

vs.

Lerna Wright Niles
Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

SEP 29 1967

ALICE J. DUCK

CLERK
REGISTER

R. Lacey
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

OCT 2 1967

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this *Oct 6* 19*67*

by leaving a copy with

Lerna Wright Niles

L. Lacy

Sheriff claims *70* miles at

Ten Cents per mile Total \$ *7.00*

TAYLOR WILKINS, Sheriff

BY *Ran Dahl*
DEPUTY SHERIFF

Layn Wilkins, Sheriff
Roy Randall Deputy Sheriff

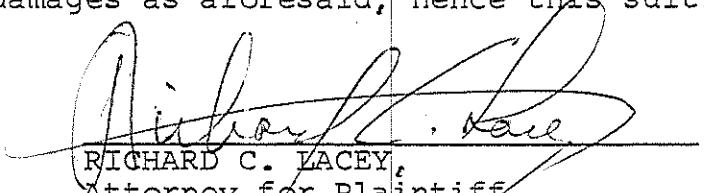
HAROLD L. WING, who sues as the)
father of Cecilia Wing, a minor,)
Plaintiff,)
VS.)
LEONA WRIGHT NILES,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

720 7171

Plaintiff claims of the Defendant the sum of FIVE THOUSAND DOLLARS (\$5,000.00), damages, for that heretofore and on to-wit: April 20, 1967, the Defendant, LEONA WRIGHT NILES, did so negligently operate a motor vehicle in an Easterly direction on Gayfer Street at the intersection of Ingleside Avenue in the City of Fairhope, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with an automobile, operated by Magdaline Wing traveling in a Southerly direction, who was a passenger in the automobile being operated by Magdaline Wing, as hereinabove state, was injured, suffered lacerations of left index finger, contusion and hermatoma of forehead, was made sick and sore, all to her damages as aforesaid, hence this suit.


RICHARD C. LACEY,
Attorney for Plaintiff

DEFENDANT MAY BE SERVED AT:

103 Liberty Street
Fairhope, Alabama

FILED

SEP 29 1967

Alice J. Duck

CLERK
REGISTER