

P. O. DRAWER A-J

RICHARD C. LACEY

TELEPHONE 928-2373

ATTORNEY AT LAW

FAIRHOPE, ALABAMA 36532

September 27, 1967

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

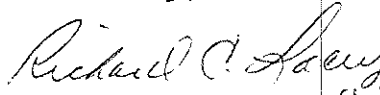
Re: Harold L. Wing
Vs.
Leona Wright Niles

Dear Mrs. Duck:

Please have the enclosed Bill of Complaint served on
Leona Wright Niles.

Thank you.

Sincerely,


Richard C. Lacey (mt)

RCL:mt

Encls.

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 7772

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonLeona 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..... Plaintiff.....
father of Harold E. Wing, a minor

Witness my hand this.....29.....day of.....Sept.....1967

.....Clerk

Ex 10-6-67

No. 7772

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Defendant lives at

RECEIVED

Received In Office

OCT 2 1967

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this Oct 6 1967

by leaving a copy with

Harold L. Wing
who sues as father of
Harold E. Wing of minor
Plaintiffs

vs.

Leona Wright Niles
Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

SEP 29 1967

Clerk

ALICE J. DUCK

CLERK
REGISTER

T. P. Lacey

Plaintiff's Attorney

Defendant's Attorney

Leona Wright Niles

J. R. Rife

Sheriff claims 70

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY *Randall*

DEPUTY SHERIFF

Wayn Wilkins

Sheriff

Ray Randall

Deputy Sheriff

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

Plaintiff,)

VS.)

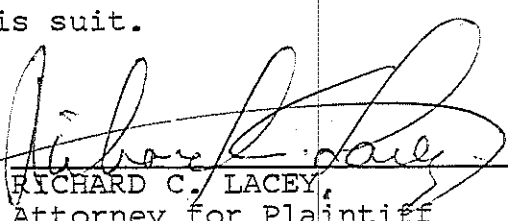
LEONA WRIGHT NILES,)

Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

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 stated, was injured, suffered a fractured nose, contusion and abrasions, was made sick and sore, all to his 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

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

Plaintiff,

vs.

LEONA WRIGHT NILES,

Defendant.

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 accident.
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.

Defendant demands a trial of this
cause by a jury.

Chasen, Stone & Chasen
Attorneys for Defendant

Chasen, Stone & Chasen
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 October, 1967.

Chasen

OCT 20 1967

CLERK
REGISTER

7772

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

Plaintiff,

vs

LEONA WRIGHT NILES,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE

* * * * *

DEMURRER

* * * * *

FILED

OCT 20 1967

MAILED 3 1/2 1967