

HUGH ROZELLE
ATTORNEY-AT-LAW
ATMORE, ALABAMA 36502

PHONES { OFFICE 368-3549
RESIDENCE 368-2676

November 17, 1967

Mrs. Alice J. Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

Re: Verlon Johnson, by natural guardian
and next friend, Dennis Johnson, Plaintiff,
vs Arthur Deese, Jr., Defendant.

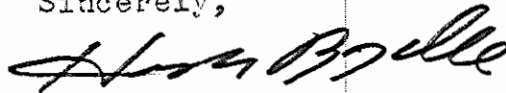
Dear Mrs. Duck:

Please find enclosed, herewith, Answer in connection
with the above mentioned damaged suit, which we desire filed.

A copy of same was forwarded to Mr. LeNoir Thompson,
Attorney for Plaintiff, on this date.

Thanking you, I am

Sincerely,



HUGH ROZELLE

HR/mm

Enclosure

VERLON JOHNSON, by natural
guardian and next friend,
DENNIS JOHNSON,

PLAINTIFF,

VS.

ARTHUR DEESE, JR.,

DEFENDANT.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA.

) AT LAW.

) NUMBER: 7790

Comes the Defendant and for answer to the complaint
in the above styled cause and to each count thereof, separately
and severly, pleads and says;

1. Not guilty.

2. That the allegations thereof are untrue.

3. That the Plaintiff at the time and place alleged
in the complaint so negligently operated the Honda Motorcycle
on which he was operating and driving as to cause the same to
come in contact with the automobile then being driven by the
Defendant, and the said negligence of the Plaintiff proximately
contributed to his said damage and injuries.

HUGH ROZELLE & TOLBERT BRANTLEY

BY: Hugh Rozelle
ATTORNEYS FOR DEFENDANT

The Defendant demands a trial by jury of the issues
in this cause.

HUGH ROZELLE & TOLBERT BRANTLEY

BY: Hugh Rozelle
ATTORNEYS FOR DEFENDANT

I certify that I have this day mailed a copy of the
foregoing plea to C. LeNoir Thompson, Attorney of Record for
the Plaintiff, at Bay Minette, Alabama.

HUGH ROZELLE & TOLBERT BRANTLEY

BY: Hugh Rozelle
ATTORNEYS FOR DEFENDANT

FILED
11-18-67
BALDWIN COUNTY, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Arthur Deese, Jr., 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 the same, then and there to answer the complaint of Verlon Johnson, by natural guardian and next friend, Dennis Johnson.

WITNESS my hand this 19 day of Oct., 1967.

Alice J. Duck

Defendant may be served:
208 Maxwell Street
Atmore, Alabama 36502

* * * * *

VERLON JOHNSON, by natural
guardian and next friend,
DENNIS JOHNSON

Plaintiff

vs

ARTHUR DEESE, JR.

Defendant

X

X IN THE CIRCUIT COURT OF

X BALDWIN COUNTY, ALABAMA

X AT LAW NO. 2290

X

X

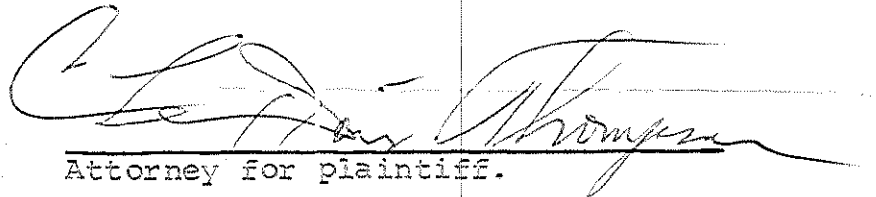
-1-

The plaintiff claims of the defendant the sum of Five Hundred Dollars (\$500.00) as damages, for that heretofore on to-wit, March 5, 1967, said plaintiff was operating a Honda motorcycle on or along U. S. Highway numbered 31 in Baldwin County about 1.6 miles North of the Community of Stapleton in Baldwin County, Alabama, at or about 2:00 P.M., where he had a right to be and Arthur Deese, Jr., so negligently operated his Cadillac automobile which he was then and there operating so as to run into, over, upon or against the Honda motorcycle which your said plaintiff was then and there riding and plaintiff avers that as a proximate consequence thereof, he was severely injured, suffering cuts, bruises and contusions which caused said plaintiff much pain and anguish and he was hospitalized for medical treatment which he received, all of which damages were proximately caused by the said negligence of the said defendant; hence, this action.

EX-10-23-67

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Plaintiff claims of the defendant the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on to-wit, March 5, 1967, said plaintiff was operating a Honda motorcycle on or along a public highway in Baldwin County to-wit, U. S. Highway numbered 31 South of Bay Minette, and approximately 1.6 miles North of the Community of Stapleton in Baldwin County, Alabama, where he had a right to be and the defendant negligently operated his Cadillac automobile which he was then and there operating so as to run into, over or against the Honda motorcycle on which your said plaintiff was then and there riding and plaintiff avers that as a proximate consequence thereof, the said motorcycle was severely damaged, the back wheel being bent, the frame being bent, the motor being damaged all of which damages were proximately caused by the said negligence of the said defendant.


Attorney for plaintiff.

FILED

OCT 19 1967

ALICE J. DECK CLERK
RECEIVED

7790

RECEIVED

OCT 19 1967

TAYLOR WILKINS
SHERIFF

Verlon Johnson, by
natural guardian &
next friend, Dennis
Johnson,

p/tg.

vs.

Arthur Deese, Jr.
Deft.

Summons & Complaint

Executed 10-23-67
By serving a copy
on Arthur Deese Jr.
By Atton Keefer JS

FILED

OCT 19 1967

ALICE J. DUCK
CLERK
REGISTER

C. L. Thompson, Atty