

JOHN W. CONWAY, SR., : IN THE CIRCUIT COURT OF
 Plaintiff, : BALDWIN COUNTY, ALABAMA
v. : AT LAW
JAMES T. DUMAS, :
 Defendant. : CASE NO. 7812

AMENDED ANSWER

Comes now the defendant in the above-styled cause, James T. Dumas, and amends the answer heretofore filed, and as an additional separate and several plea to each count of the complaint heretofore filed, he files the following additional separate and several pleas, separately and severally:

2. At the time and place alleged in the complaint, to-wit: October 7, 1967, on U. S. Highway 98, in Baldwin County, Alabama, at a point approximately two miles West of the Fish River Bridge, the plaintiff did so negligently operate an automobile on said highway so as to cause or allow the same to collide with the vehicle of the defendant, being operated at that time and place and on said highway, and as a proximate result thereof, plaintiff was guilty of negligence in and about the operation of his

automobile which proximately contributed to the accident resulting therefrom, and to his alleged injuries and damages; therefore, plaintiff ought not recover.

Donald Bruce

Defendant respectfully demands a trial by jury.

Donald Bruce

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing Amended Answer to Norborne C. Stone, Jr., Esq., attorney for the plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to him at his office in Bay Minette, Alabama, on this the 8 day of January, 1968.

Donald Bruce

FILED

JAN 9 1968

ALICE J. DUCK CLERK
REGISTER

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:

P O DRAWER C
OR P O BOX 123

CABLE ADDRESS:
HAB

TELEPHONE:
432-5511
AREA CODE 205

CHAS. C. HAND
G. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH
A. CLAY RANKIN, III
ALAN E. RIFFLE

January 8, 1968

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


Re: John W. Conway, Sr., Plaintiff, v.
James T. Dumas, Defendant, At Law,
Case No. 7812

Dear Mrs. Duck:

Enclosed please find the Amended Answer of the defendant, James T. Dumas, which I request you file in the above-referenced case. A copy of this pleading has been sent to Norborne C. Stone, Jr., Esq., for his file.

With best personal regards.

Yours very truly,



For the Firm

DFP.vm

Enclosure

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

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W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
C. WAYNE LOUDERMILCH
A. CLAY RANKIN, III
ALAN E. RIFFLE

November 14, 1967

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

Re: John W. Conway, Sr., Plaintiff v.
James T. Dumas, Defendant, At Law,
Case No. 7812

Dear Mrs. Duck:

Enclosed please find the Answer of the defendant,
James T. Dumas, which I request you file in the above-
referenced case. I have sent a copy of the pleading
to Norborne C. Stone, Jr., Esq., for his file.

With best personal regards.

Yours very truly,



For the Firm

DFP.v.m

Enclosure

JOHN W. CONWAY, SR., : IN THE CIRCUIT COURT OF
 Plaintiff, : BALDWIN COUNTY, ALABAMA
v. : AT LAW
JAMES T. DUMAS, :
 Defendant. : CASE NO. 7812

A N S W E R

Comes now the defendant in the above-styled cause,
James T. Dumas, and for separate and several answer to
each count of the complaint heretofore filed, sets down
and assigns the following separate and several pleas,
separately and severally:

1. Not guilty.



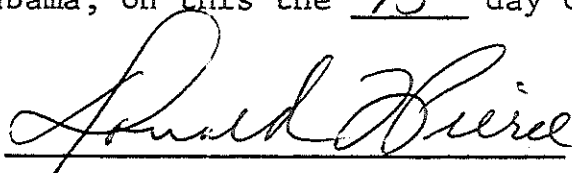
Trial Attorneys for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct
copy of the foregoing Answer to Norborne C. Stone, Jr., Esq.,
attorney for the plaintiff, by depositing a copy of same in
the United States mail, postage prepaid, addressed to him at
his office in Bay Minette, Alabama, on this the 15th day of
November, 1967.



FILED

NOV 15 1967

ALTA 1 MAY, CLERK
REGISTERED

STATE OF ALABAMA

IN THE CIRCUIT COURT - AT LAW

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James T. Dumas 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 John W. Conway, Sr.

Witness my hand this 31st day of October, 1967.

Alice S. Duck
Clerk

JOHN W. CONWAY, SR.,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

X

JAMES T. DUMAS,

X

AT LAW

7812

Defendant.

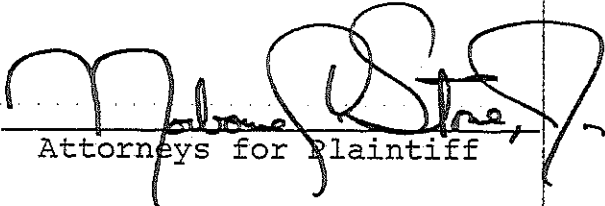
X

COUNT ONE:

The Plaintiff claims of the Defendant Fifty Thousand Dollars (\$50,000.00) as damages for that on, heretofore, to-wit: the 7th day of October, 1967 on U. S. Highway No. 98 in Baldwin County, Alabama at a point approximately 2 miles West of the Fish River Bridge, the Defendant, James T. Dumas, so negligently operated a motor vehicle as to cause or allow the same to run into, upon and against a motor vehicle being then and there operated by the Plaintiff and as a proximate consequence and result of the negligence of the Defendant aforesaid the Plaintiff suffered injuries and damages in this: he was rendered unconscious, he suffered severe pain and mental anguish, his back was broken, he was

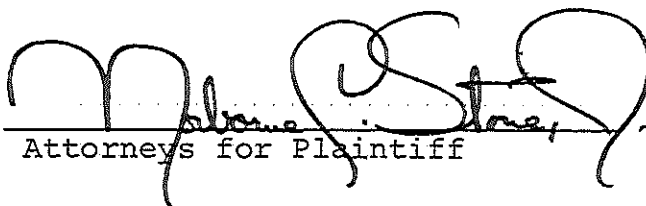
caused to be hospitalized and incur hospital and medical bills, he lost time from his work, his automobile was bent, broken and smashed and was caused to be turned over, all to his damage aforesaid, wherefore he brings this suit and asks judgment in the above amount.

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

Defendant's Address for Service:
Magnolia Springs, Alabama

FILED

OCT 31 1967

ALICE J. BARKER
CLERK
REGISTER

7812

JOHN W. CONWAY, SR.,

Plaintiff,

vs.

JAMES T. DUMAS,

Magnolia Springs
Defendant.

* * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

FILED

OCT 31 1967

AUDIE J. LAMON, CLERK
SUMMONS AND COMPLAINT

* * * *

CHASON, STONE & CHASON

ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

Received 31 day of Oct 1967

and on 3 day of Nov 1967

I served a copy of the within

on James T. Dumas

By service on James T. Dumas

TAYLOR WILKINS, Sheriff

By J. M. Eastburn, Jr.

Magnolia Springs,

Alabama.

Sheriff claims 84 miles

Ten Cents per mile Total \$ 8.40

TAYLOR WILKINS, Sheriff

By J. M. Eastburn, Jr.

DEPUTY SHERIFF