HOBERT HILTON,

Plaintiff,

Defendant.

VS.

11

R. WAYNE SELLERS,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

DEMURRER

Now comes the defendant in the above styled cause and demurs to the complaint heretofore filed in said cause and as grounds for said demurrer assigns the following separately and severally:

 It does not allege how the plaintiff's automobile was damaged.

Attorney for Defendant ----- \

JAN 1 7 1968

ALIGE J. BUCK 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 R. Wayne Sellers 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 Hobert Hilton.

Witness my hand this 15 day of December, 1967.

Alice Duck

HOBERT HILTON, X Plaintiff, X IN THE CIRCUIT COURT OF X vs. R. WAYNE SELLERS, X Defendant. X

The Plaintiff claims of the Defendant the sum of Five Thousand Dollars (\$5,000.00) as damages for that, on, to-wit: April 18, 1967 at a point on U. S. Highway 31 approximately 30 yards East of the intersection of Highway 225 and U. S. Highway 31, the Defendant negligently drove an automobile into or against the Plaintiff's automobile which he was then and there driving at said time and place and as a proximate result of the negligence of such Defendant, the Plaintiff was injured in this: his left shoulder was injured, his left elbow and left knee were injured, his back was injured, he was caused to incur medical and hospital expenses, he suffered severe pain and mental anguish, he was

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caused to lose time from his employment and his car was almost totally destroyed, all to the damage of the Plaintiff in the above mentioned sum, hence this suit.

Attorneys for Plaintiff

Plaintiff demands a trial of this

cause by a jury.

Gasan Attorneys for Plaint

Defendant's Address:

6th Avenue Atmore, Alabama

FILED

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24:1-10-68

RECEIVED No. 1918 DEC 1 5 1967 PANIOR WILKINS HOBERT HILTON, Plaintiff, vs. R. WAYNE SELLERS, Defendant/ Viugo (\mathcal{V} THINK IN THE CIRCUIT COURT OF accent will to YOOD B BALDWIN COUNTY, ALABAMA AT LAW Sheriff's Claims 6.4 miles in executing this Comp: / Summer at 10c per SUMMONS AND COMPLAINT FILD DEC 1 5 19767 CHASON BAY MINETTE, ALABAMA