

THELMA TRAWICK, X
Plaintiff, X IN THE CIRCUIT COURT OF
vs. X BALDWIN COUNTY, ALABAMA
J. G. JORDAN, X AT LAW NO. 8004
Defendant. X

Comes now the Defendant in the above styled cause, by his attorneys of record, and demurs to the Complaint heretofore filed in said cause and shows unto the Court the following separate and several grounds in support thereof, viz:

1. That said Complaint fails to state a cause of action.
2. That said Complaint is vague, indefinite and uncertain.
3. That said Complaint fails to allege with what the automobile driven by the Defendant collided.
4. That said Complaint fails to allege any negligence on the part of the Defendant.
5. That said Complaint fails to allege that the injuries suffered by the Plaintiff were the proximate result of any negligence of the Defendant.
6. That said Complaint fails to properly define and set out the injuries suffered by the Plaintiff.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Defendant.

The Defendant demands a trial of this cause by a jury.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Defendant.

FILED

MAR 25 1968

ALICE J. DUCK
CLERK
REGISTER

THELMA TRAWICK

Plaintiff

vs

J. G. JORDAN

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

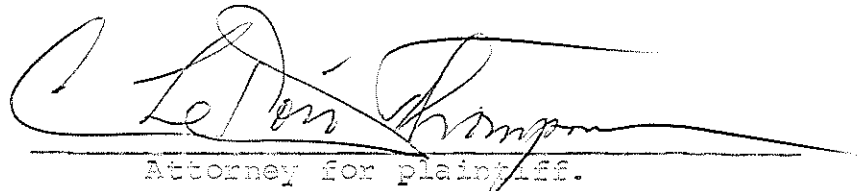
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 8004

-1-

The plaintiff claims of the defendant, J. G. Jordan, Two Thousand Fifteen and 01/100 (\$2,015.01) Dollars for damages for that on to-wit, February 21, 1967, at about 6:30 A.M., while the defendant was operating a motor vehicle on the public highways of Alabama, to-wit, Government Street at Houston Street in Mobile, Alabama, your plaintiff was a passenger in said automobile seated on the middle seat and the said automobile was involved in a collision with a non-resident and as a proximate result and consequence of the said collision, plaintiff suffered severe cuts, bruises, lacerations, wounds, broken bones and internal injuries and was made sick, sore and lame and suffered and continues to suffer severe pain and mental anguish and was permanently injured and permanently scarred and plaintiff was caused to spend great sums of money for medical, hospital, doctors and nurses care in and about the treatment of her injuries, hence this suit.


Attorney for plaintiff.

FILED

FEB 19 1968

ALICE J. DUCK 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 J. G. Jordan

.....
.....
.....

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.....

J. G. Jordan....., Defendant.....

by Thelma Trawick

.....) Plaintiff.....

Witness my hand this 19 day of Sept 1968

Ex 3-15-68

Alice J. Clark Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

THELMA TRAWICK

Plaintiffs

vs.

J. G. JORDAN

Defendants

SUMMONS AND COMPLAINT

Filed 2-19 1968Clive Dilbeck ClerkC. L. Thompson

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at may be
served: c/o Jordan's Groc.
Bay Minette, Ala.**RECEIVED**

Received In Office

MAR 12 1968

TAYLOR WILKINS

SHERIFF

19.....

Sheriff

I have executed this summons

this March 15 1968

by leaving a copy with

J. G. JordanTaylor Wilkins SheriffW. A. Talbot Deputy Sheriff

THELMA TRAWICK

Plaintiff

vs

J. G. JORDAN

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Comes the plaintiff in the above styled cause and
moves this Honorable Court to dismiss said cause and herewith
tenders costs incurred todate.


Attorney for plaintiff.

FILED

APR 17 1968

ALICE J. DUCK CLERK
REGISTER