

April 8, 1968

CHRISTINE ALEXANDER, Plaintiff
VS

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

DENVAL J. STAMEY, Defendant

CASE NO. 8,060

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Mabel Amos, Secretary of State, hereby certify that on March 29, 1968
I sent by certified mail in an envelope addressed as follows:

" Denva J. Stamey
Baton Rouge, Louisiana 70803"

"Certified Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

" Denva J. Stamey
Baton Rouge, Louisiana 70803

You will take notice that on March 29, 1968 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: CHRISTINE ALEXANDER, Plaintiff VS DENVAL J. STAMEY, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 8,060 a true copy of which summons and complaint is attached hereto and the said service upon me as Secretary of State of the State of Alabama has the force and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 29th day of March, 1968

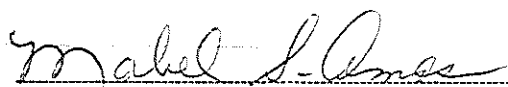
Enclosure (1)

(Signed) Mabel Amos
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed as above set forth had attached to it a true copy of the summons and complaint in the above-styled cause.

I further certify that on April 5, 1968 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Baton Rouge, La.
on April 4, 1968

WITNESS MY HAND and the Great Seal of the State of Alabama this the 8th day of April, 1968



Mabel Amos
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
CC: Honorable Tolbert M. Brantley
Wilters & Brantley
Bay Minette, Alabama 36507

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.....8060.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon**Denval J. Stacey**.....

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.....

.....**Denval J. Stacey**....., Defendant.....

by**Christine Alexander**.....

....., Plaintiff.....

Witness my hand this.....**22nd**.....day of.....**March**.....**1968**.....

Alice J. Luck Clerk

CHRISTINE ALEXANDER,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
DENVAL J. STAMEY,)	AT LAW
Defendant.)	CASE NO. <u>8060</u>

BILL OF COMPLAINT

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on to-wit: March 26, 1967, the Plaintiff was riding in a motor vehicle along or upon U. S. Highway #90, a public highway in Baldwin County, Alabama, at a point approximately twelve (12) miles East of the Town of Robertsdale, Alabama. At said time and place, the Defendant so negligently operated his motor vehicle as to cause or allow it to run into the motor vehicle in which the Plaintiff was riding, and as a direct and proximate consequence and result of said negligence, the Plaintiff was injured as follows:

both legs were bruised, strained and torn, and she was permanently injured.

The Plaintiff was caused to expend large sums of money for treatment in an effort to treat and heal her injuries. She was caused to lose time from work, all to the loss of the Plaintiff in the aforesaid amount.

The Plaintiff further avers that the Defendant is and was on the date of the collision, to-wit: March 26, 1967, a non-resident of the State of Alabama. That the present post office address of the Defendant is Baton Rouge, Louisiana, and the Plaintiff prays for the service of process upon him in accordance with

the provisions of the 1940 Code of Alabama, recompiled in 1958,
Title 7, Section 199.

WILTERS & BRANTLEY

BY: Tolbert M. Brantley

Tolbert M. Brantley

The Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

BY: Tolbert M. Brantley

Tolbert M. Brantley

FILED

MAR 22 1968

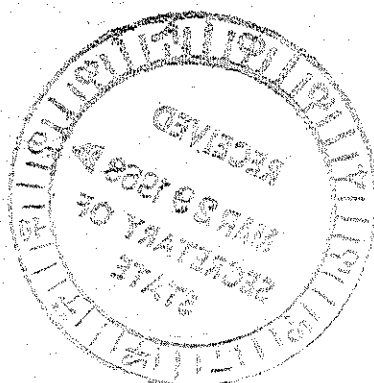
AUDIE J. DUCK

CLERK
REGISTER

FILED

MAR 22 1968

AUDIE J. DUCK
CLERK
REGISTER



CHRISTINE ALEXANDER)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY ALABAMA
vs)	
DENVAL J. STAMEY)	AT LAW
Defendant)	CASE NO <u>8060</u>

Comes Now the defendant in the above entitled cause, and demurs to the plaintiff's complaint, and to each count thereof, separately and severally, and as grounds for said demurrer sets down and assigns the following, separately and severally:

1. Said count fails to allege the violation of any duty owed by the defendant to the plaintiff.
2. Said count fails to allege facts showing the violation of any duty owed by the defendant to the plaintiff.
3. For aught that appears from said count, the accident did not occur on a public street.
4. For aught that appears from said count, the plaintiff was not at a place where she had a legal right to be at the time and place complained of.
5. For aught that appears from said count, the injuries and damages suffered by the plaintiff were not the proximate result of any act or failure to act on the part of the defendant.
6. For that said count fails to allege any causal connection between the alleged negligence of this defendant and the alleged damages of the plaintiff.

LYONS, PIPES & COOK
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 30 day of April, 1968, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

Augustine Meeker

BY: 

Walter M. Cook

FILED

MAY 1 1968

ALICE J. BUCK CLERK
REGISTER

CHRISTINE ALEXANDER,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
DENVAL J. STAMEY,)	CASE NO. <u>8060</u>
Defendant.)	

BILL OF COMPLAINT

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on to-wit: March 26, 1967, the Plaintiff was riding in a motor vehicle along or upon U. S. Highway #90, a public highway in Baldwin County, Alabama, at a point approximately twelve (12) miles East of the Town of Robertsedale, Alabama. At said time and place, the Defendant so negligently operated his motor vehicle as to cause or allow it to run into the motor vehicle in which the Plaintiff was riding, and as a direct and proximate consequence and result of said negligence, the Plaintiff was injured as follows:

both legs were bruised, strained and torn, and she was permanently injured.

The Plaintiff was caused to expend large sums of money for treatment in an effort to treat and heal her injuries. She was caused to lose time from work, all to the loss of the Plaintiff in the aforesaid amount.

The Plaintiff further avers that the Defendant is and was on the date of the collision, to-wit: March 26, 1967, a non-resident of the State of Alabama. That the present post office address of the Defendant is Baton Rouge, Louisiana, and the Plaintiff prays for the service of process upon him in accordance with

the provisions of the 1940 Code of Alabama, recompiled in 1958,
Title 7, Section 199.

WILTERS & BRANTLEY

BY: Tolbert M. Brantley
Tolbert M. Brantley

The Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

BY: Tolbert M. Brantley
Tolbert M. Brantley

FILED

MAR 22 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. 8060

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Derval J. Stamey

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

Derval J. Stamey

Defendant

by Christine Alexander

Plaintiff

Witness my hand this 22nd day of March 1968

Alice J. Clark Clerk

4:3-29-68

VOL

61 PAGE 907

No. 8060.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

CHRISTINE ALEXANDER

Plaintiffs

vs.

DENVAL J. STAMEY

Defendants

SUMMONS AND COMPLAINT

Filed March 22, 1968

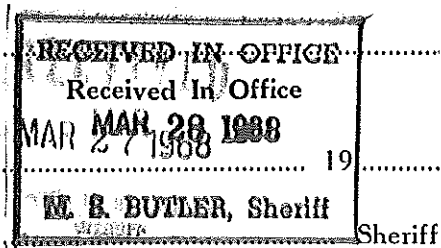
Alice J. Duck Clerk

Wilters & Brantley

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at



I have executed this summons

this 19

by leaving a copy with

Executed by serving 3 copies of
the within on *Mable Ann*
Secretary of State of The State of
Alabama.

(This the 29 day of Mar 19 68

Sheriff of Montgomery County

M. S. Butler,

By *W. L. Moser* D. S.

M. S. Butler, Sheriff of Montgomery

County, Alabama, Claim \$1.50 each for

serving *+* process(es) and \$1.00

travel expense on each of *1* Sheriff

process(es) or a total of *\$2.50* Deputy Sheriff

W. L. Moser Deputy Sheriff
10 miles