

SEALE, MARSAL, SEALE & DUKE

LAWYERS

2410 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

May 9, 1968

HARRY SEALE

M. A. MARSAL

A. J. SEALE

LEON G. DUKE

MAILING ADDRESS

POST OFFICE BOX 1746

432-6686

Clerk's Office
~~Circuit Court, Baldwin County~~
County Courthouse
Bay Minette, Alabama

Re: Mrs. Jerry M. Hollis vs. Frank Webster Grimes
No. 8106

Dear Sir:

Will you please file the enclosed answer in the
above captioned case.

Yours truly,

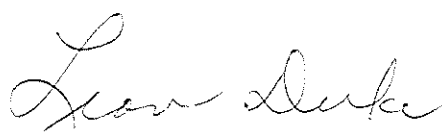


LEON DUKE

LD:egk

MRS. JERRY M. HOLLIS, : IN THE CIRCUIT COURT
Plaintiff, : OF BALDWIN COUNTY
VS. : ALABAMA
FRANK WEBSTER GRIMES, : CIVIL DIVISION
Defendant. : NO. 8106

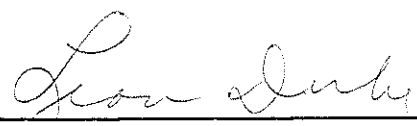
Comes the defendant in the above-styled cause
and respectfully demands a trial by jury.


LEON DUKE, Attorney for Defendant

Comes the defendant and for answer to the plaintiff's
complaint says as follows:

O N E

Not guilty.


LEON DUKE, Attorney for Defendant

I certify that I served the foregoing on the plaintiff's
attorney, Hon. John E. Chason by mailing him a copy on this
9th day of May, 1968.


LEON DUKE, Attorney for Defendant

FILED

MAY 10 1968

ALICE J. DUCK, 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 Frank Webster Grimes 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 Mrs. Jerry M. Hollis.

Witness my hand this 26 day of April, 1968.

Alice J. Lusk
Clerk

MRS. JERRY M. HOLLIS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
FRANK WEBSTER GRIMES,	X	AT LAW
Defendant.	X	8106

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Seven Hundred Dollars (\$700.00) as damages for that on, heretofore, to-wit: the 25th day of November, 1967, at a point on U. S. Highway No. 31 eight-tenths of a mile South of the City Limits of Bay Minette in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause the same to run into, upon or against a motor vehicle owned by the Plaintiff and as a proximate result of such negligence, the said automobile of the Plaintiff was damaged in that its front bumper and their brackets, its front grill and right front fender, its headlights and its hood were bent, damaged or broken, its right front wheel was damaged

and its frame was bent, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Seven Hundred Dollars (\$700.00) as damages for that on, heretofore, to-wit: the 25th day of November, 1967 at a point on U. S. Highway No. 31 eight-tenths of a mile South of the City Limits of Bay Minette in Baldwin County, Alabama, the Defendant so wilfully and wantonly operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle owned by the Plaintiff thereby wilfully and wantonly damaging the automobile of the Plaintiff in that its front bumper and their brackets, its front grill and right front fender, its headlights and its hood were bent, damaged or broken, its right front wheel was damaged and its frame was bent, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

FILED

APR 26 1968

ALICE J. DUCK CLERK
REGISTER

8106 4726

MRS. JERRY M. HOLLIS,
Plaintiff,

vs.

FRANK WEBSTER GRIMES,
Defendant.

Defendant may be served at
7575 Broad Street, Mobile,
Alabama, or Hodges Body Shop,
2002 Halls Mill Road, Mobile,
Alabama.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

APR 26 1968

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

Received 26 day of April 1968
and on 1 day of May 1968
I served a copy of the within
on Frank Webster Grimes

By service on
TAYLOR WILKINS, Sheriff
By Jackson D. S.

FILED
RECORDED
BALDWIN COUNTY, ALA.
APR 26 1968