

X 1 0 2  
TRANSFER  
**NOTICE of APPEAL**

STATE OF ALABAMA, }  
MOBILE COUNTY }

**Mrs. Percy A. Bryant**

Plaintiff

VS.

**Alfred O. Davis**

**106 W. 15th St., Bay Minette, Alabama**

Defendant

**Alfred O. Davis**

To .....

in said Cause: **Mrs. Percy A. Bryant VS Alfred O. Davis**

You are hereby notified that.....

**Mrs. Percy A. Bryant**

.....in the above entitled cause has prayed  
the plaintiff  
and ob- a transfer to the Circuit Court of Baldwin County, Alabama

tained an appeal from the judgement therein rendered by .....  
from  
Judge of the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having

complied with the requirements of the law in such cases made and provided, the same has

been granted to the next term of the CIRCUIT COURT of Mobile County, to be held for

said County, you are hereby notified accordingly.

Given under my hand this the **25** day of **June** 19**68**

*J. D. Richardson*  
Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 66484

Mrs. Percy A. Bryant

Plaintiff,

VS

Alfred O. Davis  
106 W. 15th Street  
Bay Minette, Alabama

Defendant.

NOTICE OF APPEAL  
~~DEMAND~~ TRANSFER

Returnable To The Circuit Court  
OF BALDWIN COUNTY

Issued: June 25, 1968

Serve On:

Alfred O. Davis

REC'D SHERIFF DEPT.  
BALDWIN COUNTY, ALA.

JUN 25 2 44 PM '68

BY

Received 27 day of June 1968  
and on 7 day of July 1968  
served a copy of the within notice of appeal  
on Alfred O. Davis  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

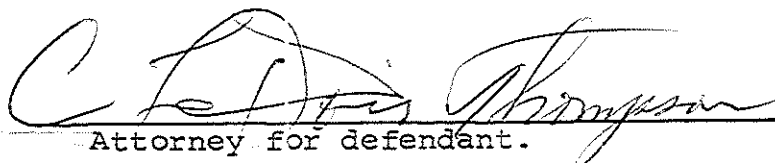
By W. G. Salbeck D. S.

REC'D SHERIFF DEPT.  
BALDWIN COUNTY, ALA.  
JUN 26 9 30 AM '68  
BY

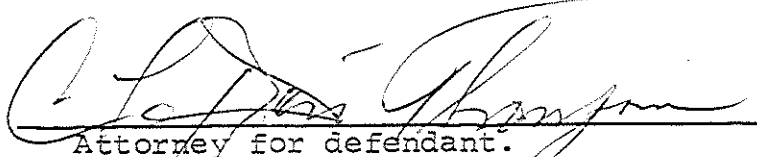
MRS. PERCY A. BRYANT	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
ALFRED O. DAVIS	X	AT LAW NO. <u>8188</u>
Defendant	X	

Comes the defendant in the above styled cause and for demurrer to the complaint filed in said cause shows unto this Honorable Court as follows:

1. Said complaint fails to state a cause of action.
2. That for aught alleged in said complaint, there was no driver in the automobile alleged to be owned by Alfred O. Davis in that the said plaintiff fails to name or allege a driver of said automobile.
3. For aught alleged in said complaint, there is no allegation that Alfred O. Davis was driving said automobile alleged to be owned by him.
4. That for aught alleged in said complaint there was no specific act alleged as a negligent act of Alfred O. Davis in the operation of said automobile.
5. For aught alleged in said complaint there is no allegation as to the location or direction of travel of said plaintiff's automobile.
6. That for aught alleged in said complaint there is no driver shown to be operating the automobile of said plaintiff.

  
Attorney for defendant.

Defendant respectfully demands a trial by jury.

  
Attorney for defendant.

**FILED**

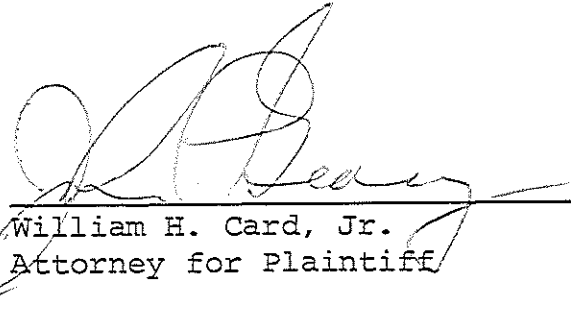
JUL 12 1968

**ALICE J. DUCK** CLERK  
REGISTER

MRS. PERCY A. BRYANT                    )     IN THE GENERAL SESSIONS  
                  Plaintiff                    )     COURT OF MOBILE COUNTY,  
VS.                    )     ALABAMA  
ALFRED O. DAVIS                    )     AT LAW  
                  Defendant                    )     CASE NO. 8188

COUNT ONE

The Plaintiff claims of the Defendant, the sum of to-wit, SEVEN HUNDRED FIFTY AND NO/100 (\$750.00) DOLLARS, as damages for that heretofore and on to-wit, the 29th day of November, 1967, Plaintiff's said automobile was being operated on or along Hand Avenue at or near its intersection with West 15th Street said Hand Avenue being then and there a public street in the City of Bay Minette, County of Baldwin Alabama, that at said time and place the Defendant did so negligently operate a motor vehicle along said Hand Avenue as to cause or allow the same to collide with the Plaintiff's said automobile and as a proximate result and natural consequence of the negligence of the Defendant as aforesaid, Plaintiff's said automobile was badly bent, broken, crushed and otherwise damaged, all to the damages of the Plaintiff hence this suit.

  
William H. Card, Jr.

Attorney for Plaintiff

Defendant's address:

106 W. 15th Street  
Bay Minette, Alabama

4/12.

## COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOORThe State of Alabama, }  
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Alfred O. Davis

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile  
County, on the 20 day of May, 1968 at the hour of 9:00 A.M.,  
then and there to answer a complaint of Mrs. Percy A. Bryant

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this APR 18 1968 day of May, 1968J. D. Richardson  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action

~~Accident~~  
**COMPLAINT AND SUMMONS**

Atty. for Plaintiff: Wm. H. Card, Jr.

Atty. for Defendant:

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**THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY**

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No. 66484

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Ret.

May 20, 1968

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Mrs. Percy A. Bryant

VS.

Alfred O. Davis

106 W. 15th St.

Bay Minette, Ala.

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Continued To

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Executed by Service on

---

Defendant

This ..... day ....., 19.....

Sheriff of Mobile County

By .....  
Deputy Sheriff

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## COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS  
COURTROOM "B" FIRST FLOOR

The State of Alabama, }  
MOBILE COUNTY

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G. D. Richardson  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action \_\_\_\_\_

**COMPLAINT AND SUMMONS**

Atty. for Plaintiff: Wm. H. Card, Jr.

Atty. for Defendant:

**THE COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY**

No. 66484

Ret.

May 20, 1968

Mrs. Percy A. Bryant

VS.

Alfred O. Davis  
106 W. 15th St.  
Bay Minette, Ala.

Continued To

*Sheriff's Del.*

RECEIVED

MAY 2 1968

TAYLOR WILKINS  
SHERIFF

Executed by Service on

Alfred O. Davis  
Defendant

This 20 day May, 1968.

*Paul*  
Sheriff of Mobile County

By W. A. Zeller  
Deputy Sheriff

REC'D SHERIFF DE  
MOBILE COUNTY, ALA

APR 17 10 04 AM

BY

REC'D SHERIFF DEPT.  
MOBILE COUNTY, ALA.

MAY 22 8 50 AM '68

BY

TAYLOR WILKINS SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING 1 PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$        
PROCESS(ES) OR A TOTAL OF \$ 1.50