

|                    |   |                         |
|--------------------|---|-------------------------|
| MARY DOROTHY MOSS, | Ø | IN THE CIRCUIT COURT OF |
| Plaintiff,         | Ø | BALDWIN COUNTY, ALABAMA |
| VS                 | Ø | AT LAW                  |
| CLAUDIA SUTTERS,   | Ø | CASE NO. <u>8201</u>    |
| Defendant.         | Ø |                         |

ANSWER

Comes now Mary Dorothy Moss, Plaintiff in above-styled cause, by Kenneth Cooper, her attorney, and for answer to the Defendant, Claudia Sutters' cross bill, says:

1. General issue.
2. Not guilty.

CERTIFICATE OF SERVICE

I hereby certify that I have on this day of Feb, 1970, served a copy of the foregoing on counsel of record for all parties to this proceeding by depositing same in United State mail postage prepaid, properly addressed to said counsel.

Kenneth Cooper  
Attorney for:

Kenneth Cooper  
ATTORNEY FOR PLAINTIFF

FILED  
FILED

FEB 1970

RECEIVED  
CLERK OF COURT

SUMMONS AND COMPLAINT

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
CASE NO. \_\_\_\_\_

TERM, 1968

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Claudia Sutters 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 Claudia Sutters, Defendant, by Mary Dorothy Moss, Plaintiff.

WITNESS my hand this 1 day of July, 1968.

Dee J. Smith, CLERK.

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|                    |   |                         |
|--------------------|---|-------------------------|
| MARY DOROTHY MOSS, | ℥ | IN THE CIRCUIT COURT OF |
| Plaintiff,         | ℥ | BALDWIN COUNTY, ALABAMA |
| Vs.                | ℥ | AT LAW                  |
| CLAUDIA SUTTERS,   | ℥ | CASE NO. _____          |
| Defendant.         | ℥ |                         |

COUNT ONE

Plaintiff claims of the Defendant Seven Hundred Sixty-Two <sup>82000.00</sup> and 70/100 (~~\$762.70~~) Dollars, for that, on, to-wit, 22 April, 1968, the Defendant negligently drove an automobile into an automobile in which the Plaintiff was riding, and which she was driving, on County Road No. 32, at a point approximately two miles east of Point Clear, Baldwin County, Alabama, which said road is a public road, and as a proximate result of said negligence on the part of the Defendant, the Plaintiff was made to suffer lacerations of the body and contrusions of the right hip, and to suffer great pain, and caused to suffer loss of salary; and Plaintiff's automobile was bent and broken, the window glass and mirror glass broken, the frame bent, and the doors bent and broken; and Plaintiff avers that the aforementioned damages and expenses incurred as a proximate result and consequence of aforesaid negligence of the Defendant, hence this suit.

*Plaintiff demands a  
trial by jury  
Kenneth Cooper  
Attorney*

Kenneth Cooper  
ATTORNEY FOR PLAINTIFF

\*\*\*\*\*  
Magnolia Springs  
CASE NO. 8201  
\*\*\*\*\*

Received 1st day of July 1968  
d on 9 day of August 1968  
served a copy of the within to  
Claudia Sutters  
y service on at home

TAYLOR WILKINS, Sheriff  
By M. L. Davis D.S.  
Magnolia Springs

Sheriff claims 84 miles  
Ten Cents per mile Total 8.40  
TAYLOR WILKINS, Sheriff  
BY Castner  
DEPUTY SHERIFF

MARY DOROTHY MOSS,  
PLAINTIFF,  
VS.

CLAUDIA SUTTERS,  
DEFENDANT.

\*\*\*\*\*  
Magnolia Springs, Ala  
\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

\*\*\*\*\*

ATTORNEY FOR PLAINTIFF:  
KENNETH COOPER

\*\*\*\*\*  
FILED  
\*\*\*\*\*

JUL 1 1968

ALICE J. DUCK CLERK  
REGISTER

\*\*\*\*\*  
DEFENDANT'S ADDRESS:  
Magnolia Springs, Alabama  
\*\*\*\*\*

We the jury  
find in favor of  
the plaintiff in  
the amount of  
\$650<sup>00</sup>

Harry E. Crawford.  
Foreman


MARY DOROTHY MOSS  
Plaintiff  
vs  
CLAUDIA SUTTERS  
Defendant

X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. \_\_\_\_\_

Comes the defendant in the above styled cause and demurs  
to the complaint filed in said cause as follows:

1. That said complaint fails to state a cause of action.
2. That Count One of said complaint alleges personal  
injury and property damage contrary to rules of pleading.
3. That for aught alleged Count One of said complaint  
fails to allege the plaintiff had a right to be at the time  
and place alleged therein.

  
Attorney for defendant.

I hereby certify that I have this 26 day of August, 1968,  
served a copy of the foregoing on Honorable Kenneth Cooper,  
attorney for plaintiff, by depositing copy of same in the  
U. S. Mail, postage prepaid, properly addressed to his  
office in Bay Minette, Alabama.



FILED

AUG 26 1968

ALICE J. BUCK CLERK  
REGISTER

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| ... | Y |  |
| ... | Y |  |

Mr. 64-01

100-442800  
AUG 26 1948

ALICE J. BUCK  
CLERK  
RECTOR

MARY DOROTHY MOSS, X  
Plaintiff, X  
Vs., X  
CLAUDIA SUTTERS, X  
Defendant. X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NUMBER: 8201

A N S W E R:

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

1. Not guilty.

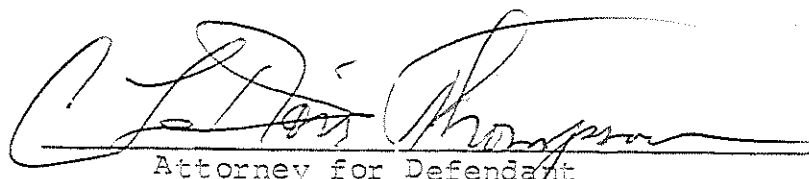
2. For further plea defendant says that plaintiff was herself guilty of negligence, which contributed proximately to damages complained of in the complaint, in that on said day and date at the time and place complained of your said complainant was operating her motor vehicle in a reckless manner and at an excessive speed, and as a consequent result of her said negligence in operating her said motor vehicle said complainant lost control of her said vehicle and crashed into the automobile of said defendant herein broadside and her damages were the consequent result of her said negligence, thereby, contributing to the damages complained of by the complainant.

3. The defendant, as a defense to the action, says that the plaintiff was indebted to her in the sum of Nine Hundred (\$900.00) Dollars being damages suffered by said defendant, as a result of the negligent operation by said plaintiff of her said automobile, which your said defendant hereby offered to set out to said plaintiff, and she claims damages to the excess.

4. Comes the defendant, Claudia Sutter, and claims of the plaintiff by way of recupment the sum of Nine Hundred (\$900.00) Dollars in that on to-wit, April 22, 1968, at a point on County Road No. 32, a public road at a point approximately two miles east of Point Clear, Baldwin County, Alabama, at the same time and place referred to in plaintiff's complaint, which said plaintiff, Mary Dorothy Moss, negligently


drover her automobile into, upon or against the automobile of the defendant as as a proximate result defendant's said automobile was damaged in that the side was bent in, the doors were damaged, the fender was damaged, the headlight was damaged and the wheel was damaged, and market value was permanently depreciated in the sum aforesaid.

5. Comes the defendant, Claudia Sutter, and claims of the plaintiff by way of recupment the sum of Three Hundred (\$300.00) Dollars in that on to-wit, April 22, 1968, at a point on County Road No. 32, a public road at a point approximately two miles east of Point Clear, Baldwin County, Alabama, at the same time and place referred to in plaintiff's complaint, the said plaintiff, Mary Dorothy Moss, negligently drove her said automobile into, upon or against the automobile of the defendant injuring said defendant, making her sick and sore so that she required medical attention and medicine and cause her pain and suffering. Wherefore, said damages.

  
Attorney for Defendant

I hereby certify that I have this day mailed a copy of the foregoing answer to Honorable Kenneth Cooper, Attorney at Law, Bay Minette, Alabama, by depositing same in the U.S. Mail.

Done this 29th day of January, 1970.



FILED

JAN 29 1970

ALICE J. DUCK CLERK  
REGISTER

8201

FILED

JAN 29 1970

ALICE J. DUCK CLERK  
REGISTER



8201



STATE OF ALABAMA  
DEPARTMENT OF PUBLIC SAFETY  
DRIVER LICENSE DIVISION  
P. O. Box 1471  
MONTGOMERY, ALABAMA 36102

COLONEL FLOYD H. MANN  
DIRECTOR OF PUBLIC SAFETY

April 17, 1970

Ms. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama 36507

Dear Ms. Duck:

Re: Acci. Case No. 68-22,789  
Mrs. Dorothy Moss Vs.  
Claudia Sutters

We are enclosing State Warrant No. 150483 in the amount  
of \$679.90.

This warrant is being forwarded to you to be applied on  
the judgment rendered in your court against Claudia Sutter  
for an accident of April 29, 1968 in Baldwin County. Claudia  
Sutters is the defendant in the case and Dorothy Moss is the  
plaintiff.

Very truly yours,

*B. J. Wilson*

B. J. Wilson, Lieutenant  
Supervisor  
Safety Responsibility Unit

BJW/ht

Enclosure

CC: Claudia Sutter  
Magnolia Springs

C. LeNoir Thompson  
Attorney At Law  
Bay Minette, Alabama 36507

Mr. Kenneth Cooper  
Attorney At Law  
Box 1000  
Bay Minette, Alabama

**DRIVE CAREFULLY -- SAVE A LIFE.**