

OWENS & PATTON
ATTORNEYS AT LAW

J. CONNOR OWENS, JR.
DAHLBERG BUILDING
P. O. BOX 729
BAY MINETTE, ALABAMA 36507
TELEPHONE NO. 937-4661
AREA CODE 205

September 9, 1968

WALTER S. PATTON, III
302 DE LA MARE STREET
FAIRHOPE, ALABAMA 36532
TELEPHONE NO. 928-9881
AREA CODE 205

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Re: Robert Glenn Campbell vs. J. R. Campbell

8310

Dear Mrs. Duck:

Enclosed is an original copy of the above styled suit.
I would appreciate it if you would attach a summons and forward
it to the sheriff's department for service. Thank you for your
aid and consideration in this matter.

Yours very truly,

Walter S. Patton

Walter S. Patton

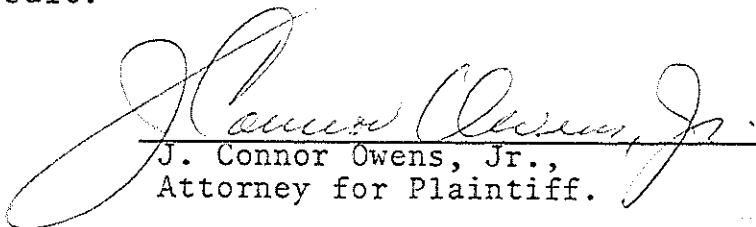
WSP/mag
Enclosure

ROBERT GLENN CAMPBELL,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	
J. R. CAMPBELL,)	AT LAW. NO. 8310.
Defendant.)	

AMENDED COMPLAINT:

Comes now the Plaintiff in the above styled cause and amends the complaint heretofore filed in said cause as follows:

The Plaintiff claims of the Defendant the sum of SIX HUNDRED FORTY FIVE AND NO/100 DOLLARS (\$645.00) as damages for that heretofore on, to-wit, November 20, 1967, the Plaintiff was driving his automobile on a public highway in Baldwin County, Alabama, known as the Campbell Road near Robertsdale, Alabama, about one mile East of the intersection of the said Campbell Road and Alabama Highway No. 59, and that said Plaintiff's automobile collided with a cow, the property of the Defendant; that said cow was running at large along said public highway without driver or custodian and that the Defendant knowingly or willfully put or placed said cow upon said public highway where said damages were occasioned; and as a proximate consequence thereof the Plaintiff's said automobile was greatly bent, mashed, broken and damaged about its front end, the front hood was bent, mashed, broken and damaged, the radiator was bent, broken, mashed and damaged, the front bumper was bent, broken and damaged, hence this suit.


 J. Connor Owens, Jr.,
 Attorney for Plaintiff.

I, the undersigned, Attorney of Record for the Plaintiff in the foregoing cause, do hereby certify that I have caused a copy of the foregoing amended complaint to be served on John V. Duck, the Attorney of Record for the Defendant, by placing the same in the United States Mail, properly addressed, with postage prepaid, this 7th day of January, 1971.

FILED

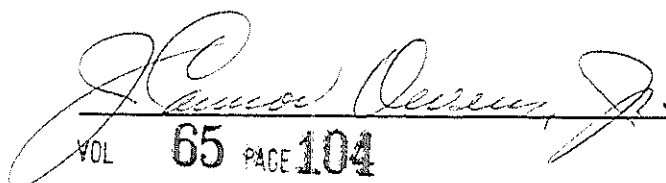
JAN 8 1970

ALICE J. DUCK

CLERK
REGISTER

VOL

65 PAGE 104




ROBERT GLENN CAMPBELL,)
Plaintiff,)
vs.)
J. R. CAMPBELL,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 8310

Comes now the Defendant in the above styled cause, and for
answer to the Bill of Complaint filed herein says:

"Not Guilty".

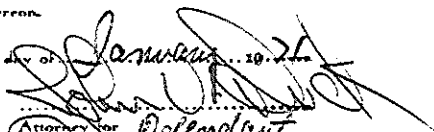


ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel
for the opposing party in the foregoing matter with a copy
of this pleading by depositing in the United States Mail
a copy of same in a properly addressed envelope with
adequate postage thereon.

This.....11..... day of.....



Attorney for Defendant

FILED

JAN 12 1971

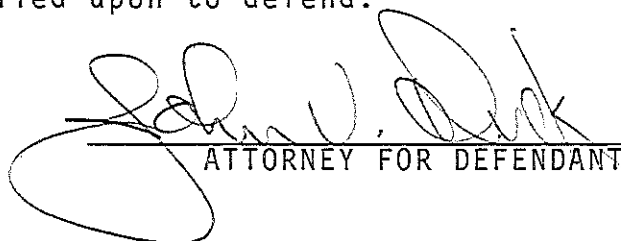
ALICE J. DUCK CLERK
REGISTER

ROBERT GLENN CAMPBELL,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW NO. 8310
J. R. CAMPBELL,)	
Defendant.)	

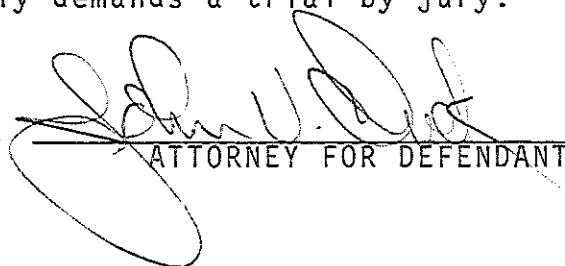
DEMURRER

Comes now the Defendant in the above styled cause, and demurs to the Bill of Complaint filed herein, and for grounds thereof assigns the following separately and severally:

1. That said Bill of Complaint does not state a cause of action.
2. That said Bill of Complaint does not allege with certainty the place that the accident happened.
3. That said Bill of Complaint alleges no negligence on the part of the Defendant.
4. That said Bill of Complaint does not allege with sufficient certainty any damages that the Plaintiff sustained.
5. That said Bill of Complaint does not allege any facts that the Defendant is called upon to defend.


ATTORNEY FOR DEFENDANT

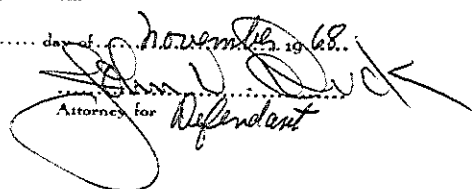
Defendant respectfully demands a trial by jury.


ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This.....26..... day of.....November..... 1968.


Attorney for Defendant

FILED

DEC 1 1968

ALICE J. DUCK CLERK
REGISTER

ROBERT GLENN CAMPBELL

Plaintiff

vs.

J. R. CAMPBELL

Defendant

)
)
) IN THE CIRCUIT COURT OF

)
) BALDWIN COUNTY, ALABAMA

)
) AT LAW

)
) 8310

COMPLAINT

Plaintiff claims of the defendant the sum of SIX HUNDRED FORTY-FIVE and no/100 (\$645.00) DOLLARS, for that on or about to-wit, November 20, 1967, the plaintiff was driving his automobile on a public highway in Baldwin County, Alabama known as the Campbell Road near Robertsdale, Alabama, that said plaintiff's automobile collided with a cow, the property of the defendant, that said cow was running at large along said public highway without driver or custodian. That the defendant knowingly or wilfully put or placed said cow upon said public highway where said damages were occasioned, Plaintiff alleges that all of said damage to his said automobile were caused as a proximate result of the negligence of the defendant as aforesaid, Hence this suit.

by: Walt J. Patton

OWENS & PATTON
Attorneys for Plaintiff

FILED

SEP 10 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. 8310

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon J. R. Campbell

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. R. Campbell, Defendant.....

by Robert Glenn Campbell, Plaintiff.....

Witness my hand this 10th day of September 1968

Alice J. Duck Clerk

Ex 11-7-68

No. 8310

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ROBERT GLENN CAMPBELL.....
Plaintiffs

vs.

J. R. CAMPBELL.....
Defendants

SUMMONS AND COMPLAINT

Filed September 10,..... 1968...

Alice J. Duck..... Clerk

OWENS & PATTON.....
Plaintiff's Attorney

.....
Defendant's Attorney

Robertdale
RECEIVED

SEP 10 1968

Received In Office

..... 19.....

..... Sheriff

I have executed this summons

this Nov 7..... 1968

by leaving a copy with

J. R. Campbell

Sheriff claims 50 miles at

Ten Cents per mile. Total \$ 5.00

TAYLOR, MILKINS, Sheriff

BY Chell Over
DEPUTY SHERIFF

Robert Dale
Sheriff

..... Deputy Sheriff

Robert Dale