

WILLIAM N. COHRON,) IN THE CIRCUIT COURT OF
 Plaintiff,) BALDWIN COUNTY, ALABAMA
 VS.) AT LAW
 JOHN WILLIAM MINCHEW and)
 STANDARD FURNITURE COMPANY,)
 A CORPORATION,)
 Defendants.) CASE NO. 8,430

ANSWER

Come now the defendants in the above styled cause, and for answer to the plaintiff's complaint and to each count thereof, separately and severally, make and file the following separate and several pleas:

1. Not guilty.
2. Defendant denies the material allegations thereof.

INGE, TWITTY, DUFFY & PRINCE

By

Sydney R. Prince, III
 Sydney R. Prince, III

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 27 day of Nov, 19 58.

Sydney R. Prince
 Attorney for

FILED

DEC 1 1968

ALICE J. DUCK CLERK
 REGISTER

WILLIAM N. COHRON

PLAINTIFF

VS.

JOHN WILLIAM MINCHEW and
STANDARD FURNITURE COMPANY,
A CORPORATION

Defendants

I

IN THE CIRCUIT COURT OF

I

BALDWIN COUNTY, ALABAMA

I

AT LAW

I

CASE NO. 8430

1.

The Plaintiff claims of the Defendants the sum of FIVE HUNDRED DOLLARS (\$500.00) as damages for that heretofore on to-wit, the 17th day of January, 1968, the Plaintiff's son was driving the Plaintiff's automobile in an Easterly direction along or upon Alabama Highway #104, which is a public highway in Baldwin County, Alabama, and at or near the point where said highway intersects with Baldwin County Highway #55, a public highway in Baldwin County, Alabama, said place being in the City Limits of Silverhill, Alabama. At this time and place, John William Minchew, who was then and there acting as the agent, servant or employee of Standard Furniture Company, a Corporation and while acting within the line and scope of his employment as such agent, servant or employee, so negligently operated the vehicle he was driving as to cause or allow the same to run into the automobile being driven by the Plaintiff's son; as a direct and proximate consequence and result of said negligence, the Plaintiff's automobile was damaged as follows: The body of the automobile was twisted and torn. The front of said automobile was crushed, glass was broken and the left side of said automobile was bent, twisted and torn, rendering said automobile valueless, except for salvage; all to the loss of the Plaintiff in the aforesaid amount. Hence, this suit.

WILTERS, BRANTLEY & NESBIT

BY:

Arthur S. Nesbit
Attorney for Plaintiff

FILED

NOV 14 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.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John William Minchew and Standard
Furniture Company, a Corporation

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.....

John William Minchew and Standard Furniture Co., A Corp Defendants.....

by William N. Cohron

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

Witness my hand this 14 day of Nov 19 68

Rebecca Duck Clerk

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24-11-15-68

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

William N. Cochran.....

Plaintiffs

vs.

John William Minchew and
Standard Furniture Defendants
A corporation

SUMMONS AND COMPLAINT

FILED

Filed 19.....

NOV 14 1968

Clerk

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

John Minchew lives at
Magnolia Springs, Ala.
standard furniture,

Bay Minette, Alabama

Received in Office

NOV 15 1968 19.....

NOTARY PUBLIC

Sheriff

I have executed this summons

this 22nd 15 1968

by leaving a copy with

John William Minchew

Standard Furniture Co.

Bay Minette, Ala.

deputy clerk

Taylor Robert R. Sheriff

W. A. J. Deputy Sheriff