

EMILY 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. 8,431

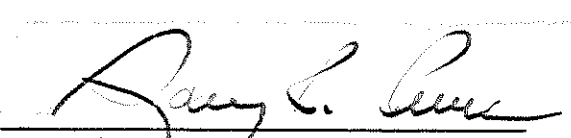
ANSWER

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. No guilty.
2. Defendant denies the material allegations thereof.

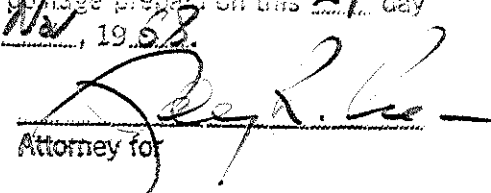
INGE, TWITTY, DUFFY & PRINCE

By


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 29 day of Nov, 1968.


Attorney for

FILED

DEC 1 1968

ALICE J. DUCK CLERK
REGISTER

EMILY COHRON

Plaintiff

VS.

JOHN WILLIAM MINCHEW
and STANDARD FURNITURE COMPANY,
A CORPORATION

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8431

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, Lewis N. Lewis, a minor, eighteen years of age, who is the son of the Plaintiff, was driving an 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 son was injured as follows: He received lacerations of his scalp, glass was imbedded in his head and he received lacerations on the fingers of his left hand. He was caused to suffer much mental and physical pain. He was severely injured and permanently injured, and the Plaintiff became legally obligated to pay the medical, hospital and doctor bills for the treatment of said injuries; all to the loss of the Plaintiff in the aforesaid amount. Hence, this suit.

FILED

NOV 14 1968

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY: *Franklin J. Nesbit*
Attorney for Plaintiff

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8431

.....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 Company, a Corp., Defendant.S...

by Emily Cohron
Plaintiff.....

Witness my hand this 14 day of Nov 19 68.

Alvin J. ... Clerk

24.11-15-68

ORIGINAL

No. *5431*

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Emily Cohron

Plaintiffs

vs.

John William Minchew
and Standard Furniture
Co., Inc.
SUMMONS AND COMPLAINT

Filed 19.....

FILED

NOV 14 1968

Clerk

ALICE J. DICK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBITT

BY:

Walter S. Nesbitt
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

John Minchew lives at
Magnolia Springs, Ala.
Standard Furniture Co.
Bay River Rd. Alabama

RECEIVED

19.....

NOV 15 1968

Sheriff

I have executed this summons

this

1968

by leaving a copy with

John W. Minchew

*Standard Furniture Co. or
Mary Thompson*

Sheriff

Deputy Sheriff