

INGE, TWITTY, DUFFY & PRINCE  
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36602

MAILING ADDRESS:

P. O. BOX 1109  
MOBILE, ALA.  
36601

CABLE ADDRESS:

TWINING  
TELEPHONE  
433-5441

THOS. E. TWITTY  
FRANCIS H. INGE (1902-1959)  
RICHARD H. INGE  
THOS. E. TWITTY, JR.  
JAMES J. DUFFY, JR.  
SYDNEY R. PRINCE, III

November 29, 1968


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

Re: Cases No. 8,430, 8431 and 8,432

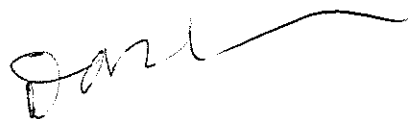
Dear Mrs. Duck:

Please mark the copies of the attached answers filed and return them to us in the enclosed envelope.

Sincerely,

  
Sydney R. Prince, III  
For the Firm

SRP, III:tt  
Enclosures



LEWIS N. LEWIS, a minor  
Suing by and through his  
Mother and Next Friend,  
EMILY 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. 8432

I

1.

The Plaintiff claims of the Defendants the sum of ONE THOUSAND FIVE HUNDRED DOLLARS (\$1,500.00) as damages for that heretofore on to-wit, the 17th day of January, 1968, 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; as a direct and proximate consequence and result of said negligence, the Plaintiff 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. The Plaintiff was caused to suffer much mental and physical pain. The Plaintiff was severely injured and permanently injured. The Plaintiff avers that he is a minor, eighteen years of age and that he is in the custody of his mother and next friend, Emily Cohron.

WILTERS, BRANTLEY & NESBIT

BY: 

Attorney for Plaintiff

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 Corporation Defendant. S.

by Lewis N. Lewis, a minor suing by and through his Mother and

next friend, Emily Cohron, Plaintiff.

Witness my hand this 14 day of Nov 19 68

*Archie J. Huerf* Clerk

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Lewis N. Lewis, a minor  
suing by and through his  
Mother and next friend,  
Emily Cohen..... Plaintiffs

vs.

John William Minchew and  
Standard Furniture Co.....  
a Corporation Defendants

SUMMONS  
**FILED** COMPLAINT

Filed..... NOV 14 1968..... 19.....

**ALICE J. DICK** Clerk  
CLERK  
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:..... Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
John Minchew lives at  
Magnolia Springs  
Standard Furniture Co.  
Bay Minette, Alabama  
Received in Office

**RECEIVED**

NOV 15 1968

Sheriff

I have ~~received~~ this summons

this Nov 15 1968  
by leaving a copy with

*John W. Minchew*

*Standard Furniture Co.*

*by leaving a*

*Mary Thompson*

Sheriff

Deputy Sheriff


LEWIS N. LEWIS, a minor suing )	IN THE CIRCUIT COURT OF
by and through his Mother and next )	
friend, EMILY COHRON, )	BALDWIN COUNTY, ALABAMA
Plaintiff, )	AT LAW
VS. )	
JOHN WILLIAM MINCHEW and )	
STANDARD FURNITURE COMPANY, )	
a corporation, )	
Defendants. )	CASE NO. 8,432

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:

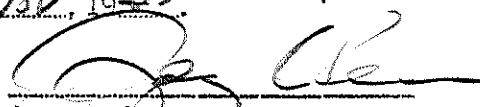
1. Not guilty.
2. Defendant denies the material allegations thereof.
3. Defendant says that at the time and place complained of in the plaintiff's complaint the plaintiff himself was negligent in and about the operation of the automobile he was driving at the time and place of the matters complained of, which negligence of the plaintiff proximately contributed to his injuries and damages, wherefore, plaintiff ought not recover.

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. BUCH CLEVER