

ARNOLD HUNTER,	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	X	
		AT LAW
LEROY STABLER,	X	
	X	CASE NO. 8557
Defendant	X	

Comes now the Plaintiff in the above styled cause and for answer to Plea 2 of the Defendant's plea, says:

1.

That he is not guilty of the matters alleged therein.

2.

For further answer, Plaintiff says that the Defendant was guilty of negligence which proximately contributed to the damage of the Defendant, in that on said time and place alleged in the pleas, the Defendant negligently failed to heed a stop signal and turn signal that the Plaintiff was giving so that he may turn from his lane into an area across the highway.

WILTERS & BRANTLEY

BY:

Henry J. Wilters
Attorney for Plaintiff

Filed

3-19-70

Reinhold
clerk

ARNOLD HUNTER)
)
Plaintiff)
)
Vs.)
)
LEROY STABLER)
)
Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
Number 8557

PLEA ONE

Comes the defendant in the above entitled cause and
for answer to the complant says he is not guilty.

PLEA TWO

Comes the defendant LEROY STABLER and without waiving the
demurrers filed to the plaintiff's complaint, says that at the time
this action was commenced, the plaintiff ARNOLD HUNTER was indebted to
him and the defendant claims of the plaintiff ARNOLD HUNTER by way of
recoupment to the defendant, the sum of THREE HUNDRED DOLLARS
for that on two-wit: the Third day of November, 1968, at a point on
Alabama Highway #59 approximately 0.6 mile South of the City limits
of Foley, Baldwin County, Alabama, in said county, the plaintiff
Arnold Hunter negligently parked his automobile without rear lights
in the night time and during a severe wind and rainstorm upon said
highway at said time and place referred to above and in the plaintiff's
complaint and as a proximate consequence of said negligence on the part
of said plaintiff, the automobile of the defendant was caused to
collide with the plaintiff's automobile and as a direct consequence
and result thereof, the defendant's automobile was damaged and the
market value thereof was permanently depreciated as aforesaid.

PLEA THREE

For further plea the defendant says: the plaintiff was
guilty of negligence which contributed proximately to the damage com-
plained of in the complaint, in that on said day and at said place
alleged in the complaint, the plaintiff negligently parked his automobile
upon said highway during the night time and without rear lights burning
whole in the midst of a severe wind and rainstorm, which said negligence
was the proximate cause of collision between the vehicles.

FILED

MAR 19 1970

ALICE J. DUCK CLERK
REGISTER

VOL 63 PAGE 766

Arthur Epperson
Attorney for the Defendant

ARNOLD HUNTER SR.)
PLAINTIFF)
VS)
LEROY STABLER)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

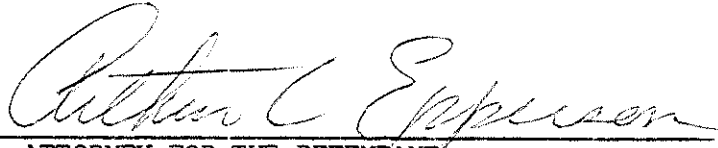
AT LAW

no. 8557


DEMURRERS

COMES THE DEFENDANT IN THE ABOVE STYLED CAUSE AND DEMURS TO THE COMPLAINT
IN THE ABOVE CAUSE AND FOR GROUNDS ASSIGNS THE FOLLOWING SEPARATE AND SEVERALLY:

1. The count does not state a cause of action.
2. The count fails to allege in what the negligence of the defendant consists.
3. The count fails to allege the time of day that the collision occurred.
4. The count fails to allege that the plaintiff was free from negligence in the matter.
5. The count fails to allege that the plaintiff did not contribute to the proximate cause of the accident.
6. For ought that appears from the count the plaintiff was negligent in the matter.
7. For ought that appears from the count the plaintiff was guilty of contributory negligence.


ATTORNEY FOR THE DEFENDANT

THE DEFENDANT DEMANDS A TRIAL BY JURY.


Attorney for the defendant

FILED

MAR 12 1969

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Leroy Stabler to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Arnold Hunter, Sr.

Witness my hand this 2 day of Feb, 1969.

Alice J. Ducey
Clerk

Arnold Hunter, Sr.
Plaintiff
VS.
Leroy Stabler
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE THOUSAND DOLLARS (\$1,000.00) as damages for that heretofore on, to-wit: the 3rd day of November, 1968 at a point on Alabama Highway #59 approximately 0.6 of a mile South of the City Limits of Foley, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon, or against the vehicle belonging to the Plaintiff and as a proximate result of such negligence, the Plaintiff's automobile was damaged in the rear, in that the trunk was bent and broken, rear bumpers were damaged, tail light and trunk damaged, the floor in the trunk was bent and broken and damage all to the loss of the Plaintiff, hence this suit.

WILTERS, BRANTLEY & NESBIT

BY: *[Signature]*
Attorney for Plaintiff

FILED

FEB 3 1969

*Defendant address
Foley Ala*

2-19-69

NO. 8537

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

ARNOLD HUNTER, SR.
Plaintiff

VS.

LEROY STABLER
Defendant

SUMMONS AND COMPLAINT

Received 3 day of Feb 19 69
and on 19 day of Feb 19 69
I served a copy of the within A & C
on Leroy Stabler
By service on _____

TAYLOR WILKINS, Sheriff
By Franklin L. Luevano

7007

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

FILED

FEB 3 1969

ALICE J. DUCK CLERK
REGISTER

W. & B. -



Putting You First In A Big Way!

J. M. LEE CHEVROLET-OLDS
Foley, Alabama 36535
"Look to Lee"

November 19, 1970

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

Re: Garnishment No. 8557½, Leroy Stabler

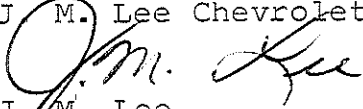
Dear Mrs. Duck:

Please find enclosed our check no. 1901 in the amount of two hundred sixty six and 46/100 dollars (\$266.46) which constitutes the amounts collected thru payroll deduction from the wages of the deceased employee, Leroy Stabler, from the date of receipt of the Garnishment No. 8557½ until the day of his death, August 22, 1970.

Please be advised that the J. M. Lee Chevrolet-Olds., Inc. is in no way indebted to the deceased.

Yours very truly,

J. M. Lee Chevrolet-Olds., Inc.


J. M. Lee
President

FILED

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ALICE J. DUCK CLERK
REGISTER

CAPRICE IMPALA STATION WAGONS MONTE CARLO CHEVELLE CAMARO
CORVETTE NOVA VEGA CHEVROLET TRUCKS



Impala Sport Coupe



Vega Coupe