

IMOGENE CHAMNESS,
Plaintiff

VS.

JAMES BAKER

Defendant

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW
*
* CASE NO. 8558

A N S W E R

Comes now the Defendant and for answer to the complaint heretofore filed files the following separate and several pleas;

1. Not guilty.

2. The Plaintiff cannot have and recover of the Defendant in this matter for at the time and place complained of in the Complaint and on, to-wit: November 4, 1968, the plaintiff's automobile was being operated in such a negligent manner so as to cause or allow the same to collide with the automobile of the defendant, James Baker, and as a direct and proximate result of the aforesaid negligence on behalf of the operator of the plaintiff's automobile the damages complained of in the complaint were proximately contributed to, hence he cannot recover.

3. The defendant, James Baker, claims of the Plaintiff SEVEN HUNDRED AND 50/100 (\$750.00) DOLLARS as damages for at the time and place complained of in the complaint the plaintiff did so negligently operate her motor vehicle so as to cause or allow the same to run into, upon or against the vehicle of the Defendant, James Baker, and as a direct and proximate result thereof the automobile of the Defendant, James Baker was bent, smashed and broken all to his damage in the amount aforesaid, hence this Plea of Recoupment.


Frank O. Alonzo, Attorney for Defendant

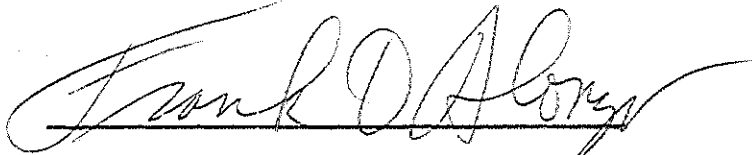
Defendant respectfully demands trial by jury.

FILED

FEB 11 1969

ALICE J. DUCK

CLERK
REGISTER


Frank O. Alonzo, Attorney for Defendant

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James Baker 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 the same, then and there to answer the complaint of Imogene Chamness.

WITNESS my hand this 1st day of February, 1969.

Alice J. Duck
Clerk

The address of the defendant is 601 Hurricane Road, Bay Minette.

* * * * *

IMOGENE CHAMNESS,

Plaintiff,

VS.

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Defendant.

IN THE CIRCUIT COURT OF

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AT LAW

8558

C O M P L A I N T

COUNT ONE

Plaintiff claims of the defendant Five Hundred Fifty Dollars (\$550.00) for that heretofore on to-wit, November 4, 1968, at a point on County Highway 39, 5.6 miles West of the City Limits of Bay Minette, Baldwin County, Alabama, and also at a point 120 feet East of Bell Pole 23R13, the plaintiff was driving her automobile on said County Road 39, which was a public highway in Baldwin County, Alabama, and at a point where she had a right to be at said time and place, and at said time and place the said defendant so negligently operated a motor vehicle so as to cause it to run into, upon or against the motor vehicle of plaintiff and as a proximate result of the negligence of the said defendant at said time and place plaintiff's motor vehicle was bent, broken and damaged, all to her damages aforesaid. Plaintiff avers that all of her damages were caused as a proximate result of the negligence of the said defendant at said time and place, hence this suit.

FEB 4 1969

ALICE J.

Ed:2-5-69

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James Baker
Attorney for Plaintiff

8558

Served 4 day of Feb 1969
on 5 day of Feb 1969
Served a copy of the within James Baker
service on _____

TAYLOR WILKINS, Sheriff

By W. A. Talbot

D. Vell

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 1.50 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$40
PROCESS(ES) OR A TOTAL OF \$ 1.90

Amogene Chambers

Plt.

vs.

James Baker

Def.

James R. Owen