

RICHARD C. LACEY  
*Attorney-At-Law*  
FAIRHOPE, ALABAMA 36532

June 17, 1969

Mrs. Alice J. Duck  
Circuit Clerk  
Circuit Court  
Bay Minette, Alabama

RE: Jim Jones, As Administrator of  
the estate of Johnny Lee Jones, Dec.  
vs. Clinton Seale Minnich

Dear Mrs. Duck:

Enclosed is the answer to Bill of Complaint in  
subject case. Thank you.

Sincerely,

*Richard C. Lacey*  
RICHARD C. LACEY  
H

RCL/dt  
encls.

JIM JONES, as Administrator of the	)	IN THE CIRCUIT COURT OF
Estate of Johnny Lee Jones,	)	BALDWIN COUNTY, ALABAMA
deceased.	)	
Plaintiff.	)	AT LAW
VS.	)	CASE NO. <u>8605</u>
CLINTON SEALE MINNICH,	)	
Defendant	)	

This day came the parties by the attorneys and proof of the acceptance of service of the summons and complaint in this cause by the defendant being duly made, and the defendant consenting that this cause may be held without further notice to him and that judgment may be rendered against him; and after hearing the evidence, the Court being of the opinion, it is considered, and ordered by the Court, and it is the judgment of the Court, that judgment be and the same is hereby rendered in favor of the plaintiff and against the defendant for the sum of THREE THOUSAND FIVE HUNDRED AND NO/100 (\$3,500) DOLLARS together with the cost in this behalf expended, and for all of which execution may issue.

Done this the 23<sup>rd</sup> day of December, 1969.

Jeffery M. Madburn  
CIRCUIT JUDGE

**FILED**

DEC 23 1969

**ALICE J. DUCK** CLERK  
REGISTER

JIM JONES, As Adm. of Estate of  
JOHNNY LEE JONES, Deceased,

Plaintiff

IN THE CIRCUIT COURT OF

vs:


BALDWIN COUNTY, ALABAMA

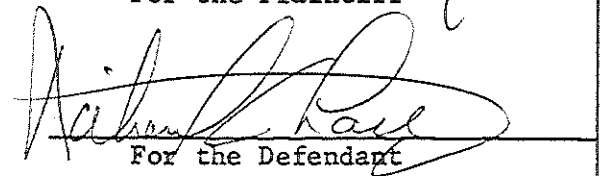
CLINTON SEALE MINNICH,

Defendant

AT LAW, CASE NO. 8605

Comes now the Plaintiff and withdraws his demand for Jury trial with  
consent of the Defendant.

  
For the Plaintiff

  
For the Defendant

FILED

DEC 23 1969

ALICE J. DUCK CLERK  
REGISTER

JIM JONES, As Administrator of  
the Estate of Johnny Lee Jones,  
deceased,

Plaintiff,

Vs.

CLINTON SEALE MINNECH,

Defendant.

) IN THE CIRCUIT COURT OF  
)  
) BALDWIN COUNTY, ALABAMA  
)

) AT LAW  
)  
)  
)

) CASE NO. 8605

The Plaintiff, who sues as Administrator of the Estate of Johnny Lee Jones, deceased, claims of the Defendant the sum of One Hundred Thousand and No/100 (\$100,000.00) Dollars as damages for that heretofore on, to-wit, the 14th day of September, 1968, the Plaintiff's intestate was crossing Highway 98 approximately 1.8 miles south of Highway 90, both of which are public roads in Baldwin County, Alabama and at said time and place, the Defendant did negligently cause, allow or permit the motor vehicle which he was driving in a northwardly direction on said Highway 98 to run into, upon or against the person of Plaintiff's intestate and as a direct and proximate consequence of said negligence, the Plaintiff's intestate received personal injuries which resulted in his death.

This action is brought pursuant to Title 7, Section 123, Code of Alabama, Recompiled 1958.

**FILED**

MAR 17 1969

**ALICE J. BUCK** CLERK  
REGISTER

MOORE, MOORE, DOWNING & LAYDEN

By: 

Lionel L. Layden  
Attorneys for Plaintiff  
920 Dauphin Street  
Mobile, Alabama

Plaintiff respectfully demands a trial by jury of this cause.

Defendant may be served at:

201 South Georgia Avenue  
Mobile, Alabama

MOORE, MOORE, DOWNING & LAYDEN

By: 

Lionel L. Layden  
Attorneys for Plaintiff

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8605

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Clinton Seale Minnech

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.....

Clinton Seale Minnich  
....., Defendant.....

by Jim Jones, As Administrator of the Estate of Johnny Lee Jones, deceased

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

Witness my hand this 17th day of March 19 69.

Deice J. Smith Clerk

*Jones*  
No. 8605

6200  
Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JIM JONES, As Administrator of the  
Estate of JOHNNY LEE JONES, deceased

Plaintiffs

261 *Jones* vs.  
CLINTON SEALE MINNECH

Defendants

SUMMONS AND COMPLAINT

Filed 3-17 19. 69

Alice J. Duck

Clerk

BY *[Signature]*  
MAR 20 9 12 AM '69  
Moore, Moore, Downing & Layden

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office  
**RECEIVED**

MAR 18 1969

19.....

Sheriff

I have executed this summons

this *Mar 26* 19. *69*

by leaving a copy with

*Clinton Seale Minnick*

*Ray D. Bridges* Sheriff

*M. E. Jones* Deputy Sheriff

JIM JONES, as Administrator of the	)	IN THE CIRCUIT COURT OF
Estate of Johnny Lee Jones,	)	BALDWIN COUNTY, ALABAMA
deceased,	)	
PLaintiff,	)	AT LAW
VS.	)	CASE NO. <u>8605</u>
CLINTON SEALE MINNICH,	)	
Defendant	)	

Comes now the Defendant in the above styled cause and demurrs to the Bill of Complaint and each count thereof as follows:

I

The Complaint fails to state a cause of action.

II

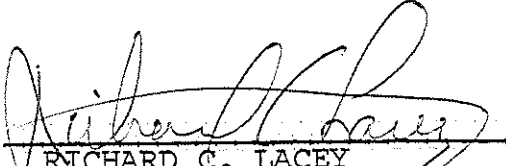
The Complaint fails to allege sufficient facts to support a cause of action.

III

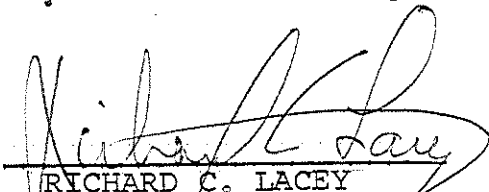
The Complaint fails to state a duty owing to the Plaintiff.

IV

Complaint fails to allege sufficient facts to notify the Defendant of the time and place alleged injuries were received by Plaintiff's intestate.

  
 RICHARD C. LACEY  
 Attorney for Defendant

I do hereby certify that I have on this 11th day of June, 1969, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

  
 RICHARD C. LACEY

**FILED**

JUN 18 1969

**ALICE J. DUCK** CLERK  
 REGISTER