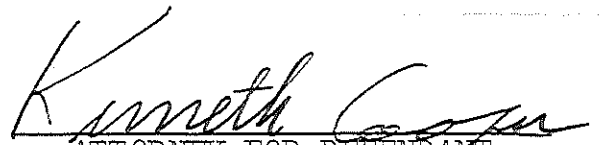


R. E. BOX,	Y	IN THE CIRCUIT COURT OF
Plaintiff,	Y	BALDWIN COUNTY, ALABAMA
Vs.	Y	AT LAW
MABLE I. STANDARD,	Y	CASE NO. 8635
Defendant.	Y	

DEMURRER

Comes now the Defendant, by her Attorney of Record, Kenneth Cooper, Esquire, and demurs to the complaint heretofore filed in this cause, and assigns as grounds therefor the following, separately and severally, to each and every count thereof, to-wit:

1. The complaint is vague.
2. The complaint is uncertain.
3. The complaint fails to state a legal cause of action.
4. The complaint fails to allege any collision between the automobile driven by Defendant and any automobile driven by the Plaintiff.


ATTORNEY FOR DEFENDANT

Defendant demands a trial by jury
in this cause.


ATTORNEY FOR DEFENDANT

I certify that I have mailed a copy of the foregoing DEMURRER to Hon. Taylor Wilkins, Jr., Attorney At Law, Bay Minette, Alabama, by depositing same in the United States Mail, postage prepaid, at Bay Minette, Alabama, on this 14 day of April, 1969.


ATTORNEY FOR DEFENDANT

FILED

APR 14 1969


ALICE J. DUCK CLERK
REGISTER

R. E. BOX,	Y	IN THE CIRCUIT COURT OF
Plaintiff,	Y	BALDWIN COUNTY, ALABAMA
VS.	Y	AT LAW
MABLE I. STANDARD,	Y	CASE NO. <u>8635</u>
Defendant.	Y	

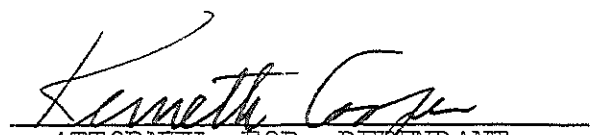
Comes now the Defendant in above-styled cause, and for Answer to the Complaint heretofore filed in this cause, saith,

1. Not guilty.
2. General issue.

For further Answer to the said Complaint, and to each and every count thereof, the Defendant saith that Plaintiff ought not to recover in this cause, for that on the occasion complained of the Plaintiff himself was guilty of negligence proximately contributing to his alleged damages, in that the Plaintiff was driving at an excessive and unsafe speed as he came up a hill and around a curve immediately prior to his automobile hitting the automobile then being operated by the Defendant, which said excessive and unsafe speed contributed to Plaintiff's damages complained of, and hence the Plaintiff ought not to recover in this suit.


ATTORNEY FOR DEFENDANT

I certify that I have mailed a copy of the foregoing Answer to Hon. Taylor Wilkins, Jr., Attorney At Law, Bay Minette, Alabama, by depositing same in the United States Mail, postage prepaid, at Bay Minette, Alabama, on this 10 day of November, 1969.


ATTORNEY FOR DEFENDANT

FILED

NOV 11 1969

ALICE J. DUCK

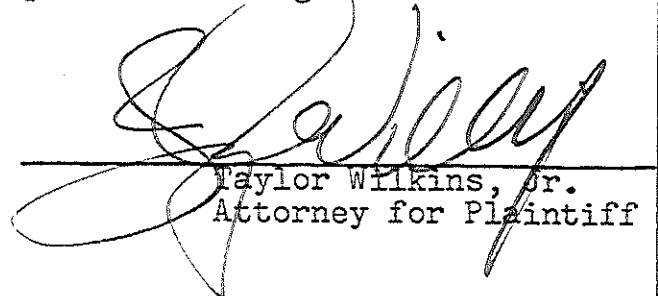
CLERK
REGISTER

R. E. BOX,
PLAINTIFF,
VS.
MABLE I. STANDARD,
DEFENDANT.

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW
X CASE NO. 8635
X

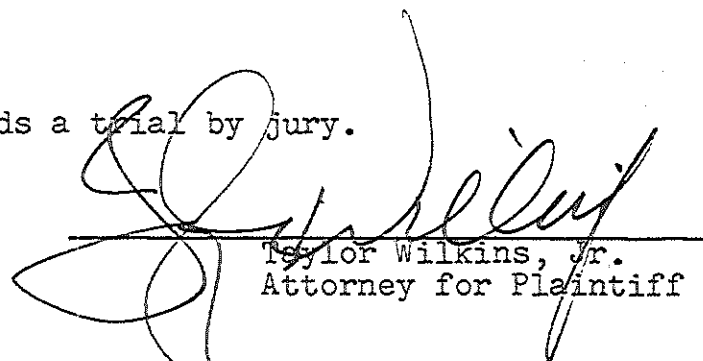
COUNT ONE

Plaintiff claims of the defendant, the sum of TWO-THOUSAND AND NO/100 (\$2000.00) DOLLARS as damages for that heretofore and on, to wit, June 14, 1968, defendant Mable I. Standard, so negligently operated an automobile on Alabama State Highway 225, a public road in the County of Baldwin, State of Alabama at or near a point on that road approximately two and one-half (2½) miles north of the Crossroads Community, that the said automobile then and there collided with the plaintiff who was then and there driving his automobile on said highway in a southerly direction, and as a proximate result of the negligence of the defendant as aforesaid, plaintiff's car was bent, broken, smashed and rendered less valuable, his front bumper, front grill and hood were smashed, his left front headlight was smashed, his automobile was knocked out of line for all of which the plaintiff brings this suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

Defendant may be served at:
109 East 1st Street
Bay Minette, Alabama

Plaintiff respectfully demands a trial by jury.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

APR 4 1969

ALICE J. DUCK CLERK
REGISTER

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 Mable I. Standard

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.....

Mable I. Standard, Defendant.....

by R. E. Box

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

Witness my hand this 4th day of April 1969

Alice J. Luck Clerk

24/4/9/69

No. 8635

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

R. E. BOX

Plaintiffs

vs.

MABLE I. STANDARD

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

109 E. 1st St

Rt 1 Box 400 - D. B. M. Ala.

Received in Office (Hy 225)

RECEIVED

APR 7 1961

19.....

Sheriff

I have executed this summons

this April 9 1961

by leaving a copy with

Mable I. Standard

10 miles west of B*1
Total \$10.00
by Edwards Sheriff
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

10 miles west of B*1