

ANITA PRIDGEN, as Adminis-	X	
tratrix of the Estate of		
HARRY KAY PRIDGEN, De-	X	IN THE CIRCUIT COURT OF
ceased,		
	X	
Plaintiff,		BALDWIN COUNTY, ALABAMA
	X	
vs.	X	AT LAW
	X	
LESLIE REDDICK,		
	X	
Defendant.		
	X	

AMENDED COMPLAINT

Comes now the Plaintiff in the above styled case and a-  
mends her Complaint heretofore filed so that the same shall read as  
follows:

COUNT ONE

The Plaintiff claims of the Defendant the sum of Seventy-  
five Thousand Dollars (\$75,000.00) as damages for that heretofore  
on, to-wit: the 10th day of May, 1968, at the present West end of  
Interstate Highway Number 10 at its intersection with Alabama  
Highway 59 near Loxley in Baldwin County, Alabama, the Defendant  
so negligently operated a motor vehicle as to cause or allow the  
same to leave the road and overturn and the deceased, Harry Kay  
Pridgen, a passenger in said car at said time, as a proximate con-  
sequence and result of such negligence of said Defendant suffered  
severe personal injuries from which he died, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Seventy-  
five Thousand Dollars (\$75,000.00) as damages for that heretofore  
on, to-wit: the 10th day of May, 1968, at the intersection of  
Interstate Highway 10 with Alabama Highway No. 59 near Loxley in  
Baldwin County, Alabama, the Defendant wantonly injured the  
Plaintiff's intestate by so wantonly operating a motor vehicle in  
which the Plaintiff's intestate was then and there riding as to

cause said vehicle to overturn and as a direct and proximate result of the wantonness of the Defendant as aforesaid, the Plaintiff's intestate received severe personal injuries as a direct and proximate result of which he died.

CHASON, STONE & CHASON

By: John Earle Chason  
Attorneys for Plaintiff

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 12th day of October, 1969.

John E. Chason

**FILED**

OCT 17 1969

**ALICE J. DUCK** CLERK  
REGISTER

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON  
LAWYERS

30TH FLOOR - FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:  
P. O. DRAWER C  
OR P. O. BOX 123

CABLE ADDRESS:  
HAB  
TELEPHONE  
432-5511  
AREA CODE 205

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
ALEX F. LANKFORD, III  
EDMUND R. CANNON  
LYMAN F. HOLLAND, JR.  
J. THOMAS HINES, JR.  
DONALD F. PIERCE  
LOUIS E. BRASWELL  
HAROLD D. PARKMAN  
G. PORTER BROCK, JR.  
HARWELL E. COALE, JR.  
STEPHEN G. CRAWFORD  
JERRY A. MCDOWELL  
W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
A. CLAY RANKIN, III  
EDWARD A. HYNDMAN, JR.  
MICHAEL D. KNIGHT

October 21, 1969

Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama

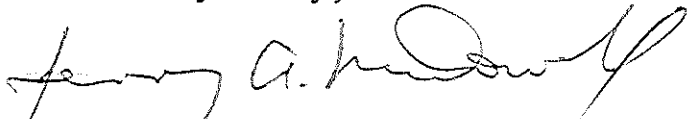
Re: Anita Pridgen, etc. v. Leslie Reddick  
Case Number 8749

Dear Mrs. Duck:

I enclose herewith a demurrer which we would appreciate your filing to the plaintiff's complaint as amended in the above-styled case.

Your consideration is appreciated.

Yours very truly,

  
For the Firm

JAMcD.cac  
Enc.

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON  
LAWYERS

30TH FLOOR, FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

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W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
A. CLAY RANKIN, III  
EDWARD A. HYNEMAN, JR.  
MICHAEL D. KNIGHT

July 11, 1969

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


Re: Anita Pridgen, etc. v. Leslie Reddick  
Case Number 8749

Dear Mrs. Duck:

Enclosed please find a demurrer which we would appreciate your filing on behalf of the defendant. Would you please note the date filed on the carbon of this letter and return the same for my file.

Your consideration is appreciated.

Yours very truly,

  
For the Firm

JAMcD.cac  
Enc.

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR - FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

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HARWELL E. COALE, JR.  
STEPHEN G. CRAWFORD  
JERRY A. MCDOWELL  
W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
A. CLAY RANKIN, III  
EDWARD A. HYNDMAN, JR.  
MICHAEL D. KNIGHT

July 11, 1969

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

Re: Anita Bridgen, etc. v. Leslie Reddick  
Case Number 8749

Dear Mrs. Duck:

Enclosed please find a demurrer which we would appreciate your filing on behalf of the defendant. Would you please note the date filed on the carbon of this letter and return the same for my file.

Your consideration is appreciated.

Yours very truly,

For the Firm

JAMcD.cac  
Enc.

Filed this \_\_\_\_\_ day of \_\_\_\_\_, 1969.

ANITA PRIDGEN as	:	IN THE CIRCUIT COURT OF
Administratrix of the	:	
Estate of Harry Kay	:	BALDWIN COUNTY,
Pridgen, deceased,	:	
Plaintiff	:	ALABAMA
v.	:	AT LAW
LESLIE REDDICK,	:	
Defendant.	:	CASE NO. 8749

D E M U R R E R

Comes now the defendant in the above-styled cause, and demurs to the plaintiff's complaint, and each count thereof, separately and severally, as amended, and for separate and several grounds of demurrer, sets down and assigns, separately and severally, the following:

1. That it does not state facts sufficient to constitute a cause of action against this defendant.
2. For that negligence is therein alleged merely as a conclusion of the pleader.
3. For that it is vague, indefinite and uncertain, in that it does not apprise this defendant with sufficient certainty against what act or acts of negligence defendant is called on to defend.
4. For that it does not appear with sufficient certainty what duty, if any, this defendant may have owed to the plaintiff's intestate.
5. For that it does not appear with sufficient certainty wherein this defendant violated any duty owed

by defendant to the plaintiff's intestate.

6. For that it does not sufficiently appear that this defendant owed any duty to the plaintiff's intestate which defendant failed to perform.

7. For that the averments set up, if true, do not show any liability on the part of this defendant.

8. For that the pleader sets out in what said negligence consisted, and the facts so set out do not show negligence.

9. For that there does not appear sufficient causal connection between this defendant's said breach of duty and plaintiff's intestate's injuries and damages.

10. No facts are alleged to show that plaintiff's intestate sustained any damage or injury as the proximate result of any negligence or breach of duty on the part of this defendant.

11. It is not alleged with sufficient certainty where said accident occurred.

12. For aught that appears, plaintiff's intestate had no right to be where plaintiff's intestate was at the time and place of said accident.

13. It is not alleged that the negligence complained of proximately caused the accident and the injuries and

damages complained of.

14. For that said count is duplicitous.

15. For that each injury complained of in the alternative could not result from each alternative act allegedly causing such injury.

16. For that each alternative averment does not state facts sufficient to constitute a cause of action against this defendant.

17. It is not alleged that the wanton conduct complained of proximately caused the accident and the injuries and damages complained of.

18. There is no allegation of either a willful or wanton act committed by this defendant.

19. There is no allegation of either a willful or wanton injury committed by this defendant.

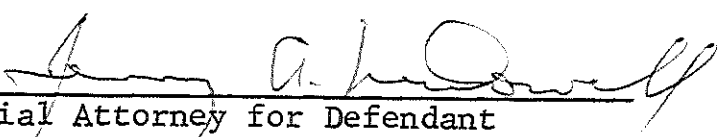
20. For aught that appears plaintiff's intestate was a guest in the automobile of the defendant at the time and place of the accident made the basis of this suit.

21. For that the allegation that the defendant wantonly operated his automobile in which the plaintiff's intestate was riding constitutes a mere conclusion



on the part of the pleader, insufficient facts being averred in support thereof.

22. For that the allegation that the defendant wantonly injured the plaintiff's intestate constitutes a mere conclusion on the part of the pleader, insufficient facts being averred in support thereof.

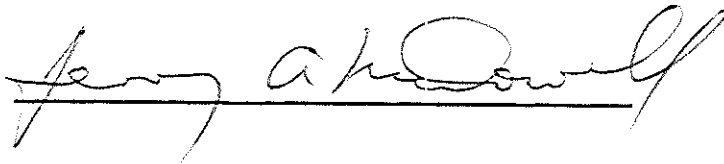
  
Trial Attorney for Defendant  
First National Bank Building  
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing Demurrer to John Earl Chason, Esq., Attorney for Plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Bay Minette, Alabama, on this, the 21st day of October, 1969.



**FILED**

OCT 22 1969

**ALICE J. DUCK** CLERK  
REGISTER

ANITA PRIDGEN as	:	IN THE CIRCUIT COURT
Administratrix of the	:	
Estate of Harry Kay	:	BALDWIN COUNTY,
Pridgen, deceased,	:	
Plaintiff	:	ALABAMA
v.	:	AT LAW
LESLIE REDDICK,	:	
Defendant.	:	CASE NO. 8749

D E M U R R E R

Comes now the defendant in the above-styled cause and demurs to each count of the complaint filed herein, separately and severally, and for separate and several grounds of demurrer, sets down and assigns, separately and severally, the following:

1. That it does not state facts sufficient to constitute a cause of action against this defendant.
2. For that negligence is therein alleged merely as a conclusion of the pleader.
3. For that it is vague, indefinite and uncertain, in that it does not apprise this defendant with sufficient certainty against what act or acts of negligence defendant is called on to defend.
4. For that it does not appear with sufficient certainty what duty, if any, this defendant may have owed to the plaintiff's intestate.
5. For that it does not appear with sufficient certainty wherein this defendant violated any duty owed

by defendant to the plaintiff's intestate.

6. For that it does not sufficiently appear that this defendant owed any duty to the plaintiff's intestate which defendant failed to perform.

7. For that the averments set up, if true, do not show any liability on the part of this defendant.

8. For that the pleader sets out in what said negligence consisted, and the facts so set out do not show negligence.

9. For that there does not appear sufficient causal connection between this defendant's said breach of duty and plaintiff's intestate's injuries and damages.

10. No facts are alleged to show that plaintiff's intestate sustained any damage or injury as the proximate result of any negligence or breach of duty on the part of this defendant.

11. It is not alleged with sufficient certainty where said accident occurred.

12. For aught that appears, plaintiff's intestate had no right to be where plaintiff's intestate was at the time and place of said accident.

13. It is not alleged that the negligence complained of proximately caused the accident and the injuries and

damages complained of.

14. For that said count is duplicitous.

15. For that each injury complained of in the alternative could not result from each alternative act allegedly causing such injury.


16. For that each alternative averment does not state facts sufficient to constitute a cause of action against this defendant.

17. It is not alleged that the wanton conduct complained of proximately caused the accident and the injuries and damages complained of.

18. There is no allegation of either a willful or wanton act committed by this defendant.

19. There is no allegation of either a willful or wanton injury committed by this defendant.

20. For aught that appears plaintiff's intestate was a guest in the automobile of the defendant at the time and place of the accident made the basis of this suit.

  
Trial Attorney for Defendant  
First National Bank Building  
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

JUL 14 1969

CVOL

65

PAGE

247

ALICE J. DUCK

CLERK  
REGISTER

CERTIFICATE OF SERVICE

I hereby certify that I have mailed  
a true and correct copy of the foregoing  
Demurrer to John Earl Chason, Esq., At-  
torney for Plaintiff, by depositing a copy  
of same in the United States mail, addressed  
to said attorney at his office in Bay Minette,  
Alabama, on this, the 11th day of July,  
1969.

A handwritten signature in cursive script, appearing to read "Jerry A. Duck", is written over a horizontal line.

FILED

JUL 14 1969

ALICE J. DUCK CLERK  
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Leslie M. Reddick 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 Anita Pridgen, as Administratrix of the Estate of Harry Kay Pridgen, deceased.

Witness my hand this 10<sup>th</sup> day of June,

1969.

Alice J. Bluek  
Clerk

ANITA PRIDGEN as Adminis-  
tratrix of the Estate of  
Harry Kay Pridgen, deceased,

Plaintiff,

vs.

LESLIE REDDICK,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

8749

COUNT ONE

The Plaintiff claims of the Defendant the sum of Seventy-five Thousand Dollars (\$75,000.00) as damages for that heretofore on, to-wit, the 10th day of May, 1968, at the present West end of Interstate Highway Number 10 at its intersection with Alabama Highway 59 near Loxley in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to leave the road and overturn and the deceased, Harry Kay Pridgen, a passenger in said car at said time, as a proximate consequence and result of the negligence of said Defendant suffered

June 23, 1969

ANITA PRIDGEN as ADMINISTRATRIX OF THE ESTATE  
OF HARRY KAY PRIDGEN, DECEASED, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA AT LAW

VS

LESLIE REDDICK, Defendant

CASE NO. 8749

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Mabel Amos, Secretary of State, hereby certify that on June 13, 1969  
I sent by certified mail in an envelope addressed as follows:

" Leslie Reddick  
824 Trudo  
New Orleans, Louisiana 70121"

"Certified Mail—  
Return Receipt Requested  
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of  
the State of Alabama in words and figures as follows:

" Leslie Reddick  
824 Trudo  
New Orleans, Louisiana 70121

You will take notice that on June 13, 1969 the Sheriff of Montgomery  
County, Alabama, served upon me, in my official capacity, summons and complaint in a  
case entitled: ANITA PRIDGEN as ADMINISTRATRIX OF THE ESTATE OF HARRY KAY  
PRIDGEN, DECEASED, Plaintiff VS LESLIE REDDICK, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW  
Case No 8749 a true copy of which summons and complaint is attached hereto  
and the said service upon me as Secretary of State of the State of Alabama has the force and  
effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 13  
day of June, 1969

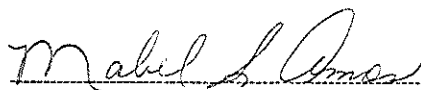
Enclosure (1)

(Signed) Mabel Amos  
Secretary of State

I further certify that the notice above set out which was so mailed in the envelope addressed  
as above set forth had attached to it a true copy of the summons and complaint in the above-styled  
cause.

I further certify that on June 23, 1969 I received the return card, showing  
receipt by the designated addressee of the aforementioned matter at Westwego, La.  
on June 20, 1969

WITNESS MY HAND and the Great Seal of the State of Alabama this the 23rd day  
of June, 1969



Mabel Amos  
Secretary of State

Enclosures: Return Receipt Card and copy  
of Summons and Complaint.

CC: Honorable John Earle Chason  
Chason, Stone & Chason  
Bay Minette, Alabama 36507

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Leslie M. Reddick 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 Anita Pridgen, as Administratrix of the Estate of Harry Kay Pridgen, deceased.

Witness my hand this 10<sup>th</sup> day of June,  
1969.

Alice J. Luck  
Clerk

ANITA PRIDGEN as Adminis- X  
tratrix of the Estate of X  
Harry Kay Pridgen, deceased, X

Plaintiff, X

vs. X

LESLIE REDDICK, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

8749

COUNT ONE

The Plaintiff claims of the Defendant the sum of Seventy-five Thousand Dollars (\$75,000.00) as damages for that heretofore on, to-wit, the 10th day of May, 1968, at the present West end of Interstate Highway Number 10 at its intersection with Alabama Highway 59 near Loxley in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to leave the road and overturn and the deceased, Harry Kay Pridgen, a passenger in said car at said time, as a proximate consequence and result of the negligence of said Defendant suffered



severe personal injuries from which he died, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Seventy-five Thousand Dollars (\$75,000.00) as damages for that heretofore on, to-wit, the 10th day of May, 1968, at the present West end of Interstate Highway Number 10 at its intersection with Alabama Highway 59 near Loxley in Baldwin County, Alabama, the Defendant so wilfully and wantonly operated a motor vehicle at said time and place as to cause the same to leave the road and overturn and the deceased, Harry Kay Pridgen, a passenger in said car at said time was thereby wilfully and wantonly injured and as a direct and proximate result of the wilful and wanton injury inflicted by the Defendant upon the person of Harry Kay Pridgen, he died, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason

Attorneys for Plaintiff

The Plaintiff respectfully demands  
trial of this cause by jury.

CHASON, STONE & CHASON

By: John Earle Chason

Defendant's Address:

824 Trudo  
New Orleans, Louisiana

**FILED**

JUN 10 1969

**ALICE J. DUCK**

CLERK  
REGISTER

8749

(3)

RECEIVED  
JUN 10 1969  
JUN 12 1969  
M. S. BUTLER, Sheriff

ANITA PRIDGEN as Administratrix of  
the Estate of Harry Kay Pridgen,  
deceased,

Plaintiff,

vs.

LESLIE REDDICK,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

SUMMONS AND COMPLAINT

\* \* \* \* \*

FILED

JUN 10 1969

ALICE J. DUCK CLERK  
REGISTER

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA

Executed by serving 3 copies of  
the within on Mable Amos  
Secretary of State of The State of  
Alabama.

[This the 13 day of June 1969

Sheriff of Montgomery County

M. S. Butler,

By W. L. Mason D. S.

M. S. Butler, Sheriff of Montgomery  
County, Alabama, Claim \$1.50 each for  
serving 1 process(es) and \$1.00  
travel expense on each of 1  
process(es), or a total of \$2.50

W. L. Mason Deputy Sheriff