

RONELY O. KOON, X  
Plaintiff, X IN THE CIRCUIT COURT OF  
X  
vs. X BALDWIN COUNTY, ALABAMA  
X  
PHILLIP LARRY NELSON, X AT LAW NO: 8778  
Defendant. X

DEMURRER:

Comes the Defendant in the above styled cause, and demurs to the Complaint filed in the above styled cause and each Count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That said Complaint is vague and indefinite.
3. That the place where the accident occurred is not sufficiently set out.
4. That said Complaint does not allege any duty owing by the Defendant to the Plaintiff.
5. That said Complaint fails to sufficiently set out the damages to his automobile.

*Jason Stone & Sons*  
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served

... to this proceeding by  
... the same to each by First Class  
United States Mail, properly addressed  
and postage prepaid on this 5 day  
of Aug 1969

AUG 5 1969

ALICE J. DUCK CLERK  
REGISTER

LAW OFFICES  
CAFFEY, GALLALEE & EDINGTON  
50 ST. EMANUEL  
MOBILE, ALABAMA  
36602

WILLIAM G. CAFFEY (1984-1964)  
JACK C. GALLALEE  
ROBERT S. EDINGTON  
J. DAVID CHERNIAK  
FREDERICK G. HELMSING  
HORACE MOON, JR.

TELEPHONE 433-2531  
AREA CODE 205

June 30, 1969

*June 30, 1969*  
*8778*

Mrs. Alice J. Duck, Circuit Clerk  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Ronely O. Koon, vs. Phillip Larry Nelson

Dear Mrs. Duck:

Enclosed please find original and copy of a law suit in the above styled matter to be filed at your convenience.

I would appreciate your advising me when service on the Defendant has been perfected so that I may mark my file accordingly.

Thanking you for your kind assistance and prompt attention in this matter, I remain

Very truly yours,

*Horace Moon, Jr.*  
HORACE MOON, JR.  
For the Firm

HM,jr:lme  
Encl.

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JACK C. GALLALEE  
ROBERT S. EDINGTON  
I. DAVID CHERNIAK  
FREDERICK G. HELMSING  
HORACE MOON, JR.  
WILLIAM R. DELANEY

April 2, 1970

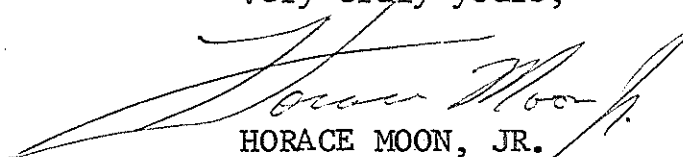
Hon. Telfair Mashburn  
Judge of the Circuit Court  
Baldwin County  
Bay Minette, Alabama

Re: Ronely O. Koon vs. Phillip Larry  
Nelson, Circuit Court Case No.  
8778

Dear Judge Mashburn:

All issues in the subject litigation have been resolved and settled, and therefore we respectfully request that this litigation be dismissed and on agreement of the parties and their attorneys costs of the litigation be taxed to the Defendant, Phillip Larry Nelson.

Very truly yours,



HORACE MOON, JR.  
For the Firm

HMJR:1c