

JOHN CECHE, JR.

Plaintiff,

vs.

J. W. POPE,

Defendant.

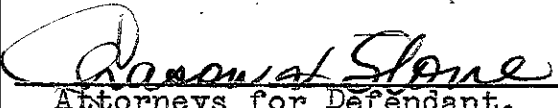
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

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

1. Said Complaint does not state a cause of action.
2. That said Complaint does not sufficiently allege the time of day or night when the accident occurred.
3. That said Complaint does not allege that the accident occurred in Baldwin County, Alabama.
4. That said Complaint does not sufficiently set out the damage to Plaintiff's automobile.
5. That said Complaint does not allege that the automobile was damaged in the amount sued for.


Attorneys for Defendant.

Defendant demands a trial of this cause by Jury.


Attorneys for Defendant.

153/
RECORDED

DEMURRER

JOHN CECCH, JR.

Plaintiff,

vs.

J. W. POPE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed: January 31st, 1951.

Lucile M. Mucke
Clerk.

STATE OF ALABAMA) To any sheriff of the State of
BALDWIN COUNTY) Alabama:

You are hereby commanded to summon J. W. Pope 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 John Cech, Jr.

Witness my hand, this 20th day of December, 1950.

Alice J. Henscher
Clerk

JOHN GECH, JR.,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA,
vs	*	AT LAW. NO.
J. W. POPE,	*	
Defendant.	*	

COUNT ONE:

Plaintiff claims of the defendant the sum of One Thousand and no/100 (\$1,000.00) Dollars, as damages in this; that heretofore, on to-wit, the 2nd day of April, 1950, the defendant so negligently operated the motor vehicle which he was then driving westwardly on U. S. Highway 90 at a point approximately one-half mile from the railroad overpass at Robertsdale, Alabama, as to cause or to allow the motor vehicle which he was driving to collide with the motor vehicle of the plaintiff, which was then being driven eastwardly on said U. S. Highway 90, and as a proximate consequence thereof plaintiff's automobile was badly broken, bent and damaged to the injury of the plaintiff, hence this suit.


ATTORNEYS FOR PLAINTIFF

DEFENDANT'S ADDRESS:

Robertsdale, Alabama
(He works for Pace-Holland)

NO 159 RECORDED
RECORDED

John Cech Jr

vs.

J. W. Pope

1591

Sum & Complaint

Counted this day of 10

Presenting the within

by serving subpoenas
Dec 20 1907

J. W. Pope

by serving subpoenas
Dec 20 1907

ALICE L. BUCK, Clerk

D. 30

Received in Sheriff's Office
this 20th day of Dec, 1907
TAYLOR WILKINS, Sheriff
15-57

LAW OFFICES OF
HOWELL AND JOHNSTON
FIRST NATIONAL BANK ANNEX
P. O. BOX 1652
MOBILE 9, ALABAMA

THOMAS O. HOWELL, JR.
THOMAS A. JOHNSTON, III
VERNOL R. JANSEN, JR.

December 13, 1950

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

Dear Mrs. Duck:

Enclosed herewith please find complaint and summon in
your Court. Thanking you, we remain

Very truly yours,

HOWELL & JOHNSTON

Thomas A. Johnston, III
Thomas A. Johnston, III

P.R.

TAJ:pr

no 15-91

John Cechke.

vs.

J.W. Burke

Danvers (now-forg)
paid 12-20-50

Stowell (Stowell).