

THERESIA WILLIAMS, Plaintiff, vs. MAUREEN HANE MARTIN, Defendant.))))))	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE. NO. 6829
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AMENDED ANSWER:

Comes now the Defendant in the above styled cause, by her Attorneys, and amends her answer heretofore filed in said cause, by adding thereto, the following plea:

3. For further plea and by way of recoupment, the Defendant claims of the Plaintiff the sum of THREE HUNDRED DOLLARS (\$300.00) damages for that heretofore on, to-wit, the 21st day of March, 1965, the Defendant was driving her automobile vehicle on U. S. Highway 31 at a point where the said highway intersects U. S. Highway 90, in Baldwin County, Alabama, at a point approximately 200 feet North of Spanish Fort Post Office, at a point where she had a right to be, and at said time and place the Plaintiff so negligently operated an automobile vehicle so as to cause it to run into, upon, or against the automobile of the Defendant, and as a proximate result of the negligence of the said Plaintiff, the Defendant's automobile was damaged as follows: the front bumper was bent, broken and damaged; the left front fender and the right front fender were bent, broken and damaged; the right front and the left front headlights were broken; she was caused to be without the use of her automobile while it was being repaired and she was put to much inconvenience in and about the loss of the use of her automobile in having it repaired. Defendant avers that all her damages were the proximate result of the negligence of the Plaintiff, hence this suit.

FILED

MAY 19 1966

ALICE L. DICK, CLERK
REGISTER

Walter S. Patton
Attorney for Defendant.

I, the undersigned, do hereby certify that I have this day mailed a copy of the foregoing amended answer to James R. Owen, the Attorney for the Plaintiff in the within styled cause, properly addressed, postage prepaid, this 18 day of May, 1966.

Walter Z. Patton

FILED

MAY 18 1966

ALICE J. DUCK, CLERK
REGISTER

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THERESIA WILLIAMS, Plaintiff, vs. MAUREEN HANE MARTIN, Defendant.))))))	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE. NO. 6829
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ANSWER:

Now comes the Defendant in the above styled cause and for answer to the Complaint heretofore filed in said cause, says, separately and severally:

1. Not guilty.
2. That at the time and place complained of, the Plaintiff was guilty of negligence which proximately contributed to her damages and injuries, because of which she should not recover in this action.

J. CONNOR OWENS, JR.

By: Walter S. Patton
Associate.

I, the undersigned, Walter S. Patton, do hereby certify that I have this day mailed a copy of the foregoing answer to James R. Owen, Attorney of Record for the Plaintiff in the above styled matter, on this the 14th day of February, 1966.

Walter S. Patton

FILED
FEB 14 1966
ALICE L. DICK, CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Maureen Hane Martin, 505 East Chillicothe Avenue, Bellefontain, Ohio, 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 Theresia Williams.

WITNESS my hand this 25 day of January, 1966.

Alice J. Luck
Clerk

* * * * *

THERESIA WILLIAMS,

Plaintiff,

VS.

MAUREEN HANE MARTIN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

6829

COMPLAINT

The plaintiff claims of the defendant the sum of Three Hundred Fifty Dollars (\$350.00) for that heretofore on to-wit, March 21, 1965, the plaintiff was driving her automobile vehicle on U. S. Highway 31 at the point where the said highway intersects U. S. Highway 90 in Baldwin County, Alabama, at a point approximately 200 feet North of Spanish Fort Post Office, at a point where she had a right to be, and at said time and place the defendant so negligently operated an automobile vehicle so as to cause it to run into, upon, or against the automobile of plaintiff and as a proximate result of the negligence of the said defendant, the plaintiff's automobile was damaged as follows: the right rear fender and bumper were bent, broken and damaged; the right rear light was broken; the water seal around the rear window was broken so as to cause rain to enter the automobile of plaintiff; the trunk of her automobile was bent and damaged; she was caused to be without the

use of her automobile while it was being repaired and she was put to much inconvenience in and about the loss of use of her automobile in having it repaired. Plaintiff avers that all of her damages were the proximate result of the negligence of the defendant, hence this suit.


Attorney for Plaintiff

FILED
JAN 7 1966
ALICE J. DUCK, CLERK
RECEIVED

84-128-66

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CASE NO. 6829

THERESIA WILLIAMS,

Plaintiff,

vs:

MAUREEN HANE MARTIN,

Defendant.

TAYLOR WILKINS
SHERIFF

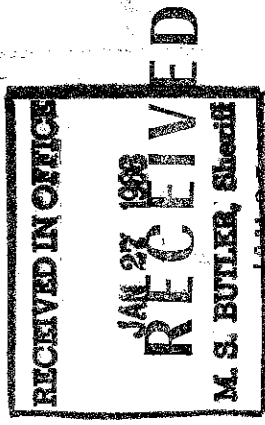
Executed by serving 3 copies of
the within on Agnes Butler
Secretary of State of The State of
Alabama.

This the 28 day of Jan 1966

Sheriff of Montgomery County

M. S. Butler,

By J. H. Kerner D. S.

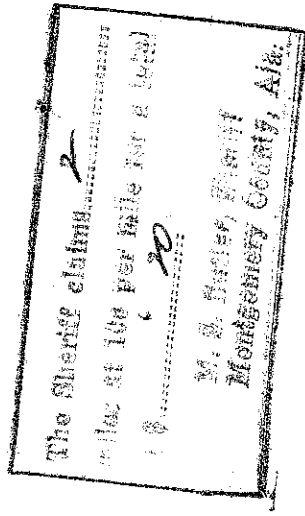


(3)

FILED

JAN 27 1966

ALICE L. DICK, REGISTRAR



James R. Owen, Atty.