

870

BRADY GREEN,

Plaintiff,

VS.

LOUIS EMMONS AND AMOS B.
SUMMERLIN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NUMBER 870.

DEMURRER

Now come the Defendants, each separately and severally,
and demur to the Complaint filed in this cause and as grounds
therefor set down and assign separately and severally the follow-
ing:

1. It does not state a cause of action.
2. There is a misjoinder of causes of action.
3. The Plaintiff has combined case and trespass in the
same count.

J. B. Blackburn

Attorney for Defendants.

Defendants demand a trial of said
cause by jury.

J. B. Blackburn

Attorney for Defendants.

DEMANDER

BRADY GREEN,

Plaintiff,

VS.

LOUIS EMMONS AND AMOS B.
SUMMERLIN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NUMBER 870.

*2nd Put 9/1944
J. B. Green*

SUMMONS

STATE OF ALABAMA

Baldwin County

Y
Y
\$
Y

IN THE CIRCUIT COURT

LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:-

You are hereby commanded to summon Louis Emmons and Amos B. Summerlin to appear within thirty days from the service of this Writ in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, then and there to answer to the Complaint of Brady Green.,

Witness my hand this the 3rd
day of July 1944.

[Signature]
Clerk of Circuit Court.

COMPLAINT

BRADY GREEN

Plaintiff

-vs-

LOUIS EMMONS and
AMOS B. SUMMERLIN
Defendants

Y
Y
Y
Y
Y
Y
Y
Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

COUNT ONE

The plaintiff claims of the defendants the Sum of Three Hundred Dollars (\$300.00) as damages, for that, heretofore on, to-wit: June 7, 1944, at about 1:45 o'clock P. M., the said defendant so negligently operated an automobile which they were then and there driving on or along U. S. Highway 31, at a point in Baldwin County, Alabama, approximately, four miles South of Bay Minette, that said automobile was driven into or against the automobile of plaintiff, which said automobile of plaintiff was being driven along or upon said highway, and as a approximate result of said negligence of defendants the automobile of plaintiff was damaged in that the trunk, back back bumper, rear end and chassis of plaintiff's automobile was bent, broken and twisted, all to the damage of plaintiff in the amount sued for, and all as aproximate result of such negligence as afore-said; wherefore plaintiff sues.

[Signature]
Attorney for Plaintiff

Received in Sheriff's Office
this 3 day of July, 1944
W. R. STUART, Sheriff
(OC 18)

Executed on this
Aug 1, 1944. By
Deputy Sheriff on
Louis Green
and copy on
Amos B. Summerlin
G. R. Ruby
Henry E. Summerlin
Council, Ala.

No. 872

BRADY GREEN
Plaintiff
vs
Louis Emmons and
Amos B. Summerlin
Defendant

In the Circuit Court of
Baldwin County, Ala.

At Law.

Stanton Ala

3 day July 3rd 1944
G. R. Ruby
and