

963

JAMES S. PATTERSON, Administrator
of the Estate of AMELIA D. WATTERS,
DECEASED,

Plaintiff,

vs.

WILLIE B. LEGER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

COUNT ONE: Plaintiff claims of the Defendant the sum of TEN THOUSAND DOLLARS damages for that on, to-wit, the 13th day of November, 1945, the Defendant so negligently operated a motor truck at a point on a public highway in Baldwin County, Alabama, at, to-wit, the approach to what is known as the Bay Bridge Road, and just West of the Spanish Fort, that he ran the same into and against the rear of a truck in which Plaintiff's intestate was then and there riding, as a result whereof she was thrown from the truck and bruised and hurt so that she died; all as a proximate consequence of the negligence of the Defendant as aforesaid; WHEREFORE this suit.



ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.



ATTORNEY FOR PLAINTIFF

Defendant's address:

604 N. College Street,
Dothan, Alabama.

Received in Sheriff's Office
this 18 day of April 1947
TAYLOR WILKINS, Sheriff

963
AT LAW

RECORDED

JAMES S PATTERSON. AS Admn

VS

WILLIE B. LEGER

SUMMONS & COMPLAINT

FILED
MAY 4 1946

D. S. DUCK, CLERK

Entered By Sending a
Copy of the Within on
Willie B Leger April 18
1947

Taylor Wilkins Sheriff.
Willie B. Leger D.S.

JAMES S. PATTERSON, Administrator
of the Estate of AMELIA D. WATTERS,

DECEASED,

Plaintiff,

vs.

WILLIE B. LEGER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

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

ONE:

That said Complaint does not state a cause of
action.

TWO:

That said Complaint is vague and indefinite.

THREE:

That said Complaint fails to properly state what
highway the wreck occurred on.

FOUR:

That said Complaint fails to properly state that
the injuries to the Plaintiff's intestate was the proximate result
of the Defendants negligence.

Robert H. Leger
Robert H. Leger
Attorneys for Defendant.

RECORDED

DEMURRER

JAMES S. PATTERSON, Administrator
of the Estate of AMELIA D.
WATERS,

DECEASED.

Plaintiff,

-vs-

WILLIE B. LEGER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Filed May 14, 1947

FILED

MAY 14 1947

ALICE J. DUCK, Clerk

JAMES S. PATTERSON, Administrator
of the Estate of AMELIA D.
WATTERS, deceased,

Plaintiff,

vs

J. C. BARBER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Comes the Defendant and for answer to the
Complaint in this cause, and to each and every count thereof,
separately and severally, pleads in short by consent the general
issue, with leave to give in evidence any matter which if well
pleaded, would be admissible in defense of the action, to have
effect as if so pleaded; and with leave to the Plaintiff to give
in evidence any matter, which if well pleaded, would be admissible
in reply to such defensive matter, to have effect as if so pleaded.

Amberrose L. L. Smith & Jackson
Debert & Baran
Attorneys for Defendant,

963

963

ANSWER

JAMES S. PATTERSON, Administrator
of the Estate of AMELIA D.
WATERS, deceased,

Plaintiff

VS.

J. C. BARBER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Filed February 27, 1947.

Alice J. Leuck
Clerk.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

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

You are hereby commanded to summon Willie B. Leger 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 James S. Patterson, Administrator of the Estate of Amelia D. Watters, deceased.

And you are hereby commanded to execute this process instanter and make return as required by law.

WITNESS my hand this the 4th day of May, 1946.



CLERK