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JAMES S. PATTERSON, ADMINISTRATOR of the Estate of AMELIA D. WATERS, Deceased,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
VS.)	
)	LAW SIDE.
J. C. BARBER,)	
)	
Defendant.)	

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:

1.

That said Complaint does not state a cause of action.

2.

That said Complaint is vague and indefinite.

3.

That the allegation in the Complaint that the Defendant 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 is vague and indefinite.

4.

That said Complaint fails to state the name or number of the public highway on which the accident occurred and fails to allege that such highway had no name or number.

5.

That said Complaint fails to allege that the negligence of the Defendant was the proximate cause of the injuries to Plaintiff's intestate.

6.

That said Complaint fails to allege that Plaintiff's intestate died as a result of the injuries she received in the accident which is the basis of this suit.

Wendrecht, Luge, Smith, & Jackson
by Carl A. Brown
Attorneys for Defendant.

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DEMURRER

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
LAW SIDE.

FILED: May 28, 1946.

Reid
Clerk.

LAW OFFICES
HYBART & CHASON
Bay Minette, Alabama

STATE OF ALABAMA,)
BALDWIN COUNTY.)

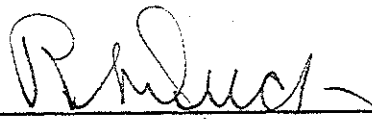
TO ANY SHERIFF OF THE STATE OF ALABAMA, -- GREETING:

You are hereby commanded to summon J. C. Barber 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

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

Plaintiff,

vs.

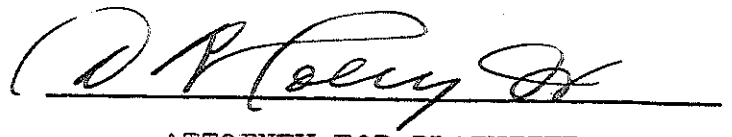
J. C. BARBER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

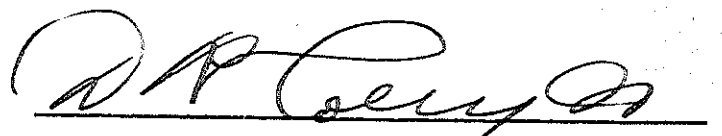
COUNT ONE: Plaintiff claims of the Defendant

the sum of TEN THOUSAND DOLLARS damages for that on, to-wit,
the 13th day of November, 1945, a servant or agent of the
Plaintiff, while acting within the line and scope of his
employment as such, 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's servant or agent as aforesaid; WHEREFORE this
suit.



ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.



ATTORNEY FOR PLAINTIFF

Defendant's address:
215 So. Bell Street,
Dothan, Alabama.

R. S. DUCK, CLERK

MAY 4 1946

FILED

SUMMONS & COMPLAINT

J C BARBER

VS

JAMES S PATTERSON AS Admin

AT LAW

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5/10/46

Executed by
Serving a copy
of the within
Summons & Complaint
on J.C. Barber

W. H. Smith
J. T. Cooney
J. S.

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