

1252

S. R. MAULDEN,  
PLAINTIFF,  
VS.  
FRED WHEELER HAGEN,  
DEFENDANT,

IN THE  
CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA

Now comes the Defendant and demurs to each and every count of the Complaint and as grounds therefor assigns the following:

1. Complaint states no cause of action.
2. There is a misjoinder of causes of action.

  
\_\_\_\_\_  
, Attorney for Defendant

20125-2

FILED

OCT 29 1948

ALICE J. DUCK, Clerk

JACK CRENSHAW

ATTORNEY AT LAW

FIRST NATIONAL BANK BUILDING

MONTGOMERY, ALABAMA

STATE OF ALABAMA §  
BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon FRED WHEELER HAGEN, 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 S. R. MAULDEN.

WITNESS my hand this the 24 day of October, 1948.

Alice J. Duck  
Clerk.

S. R. MAULDEN	¶	IN THE CIRCUIT COURT OF
PLAINTIFF	¶	BALDWIN COUNTY, ALABAMA
VS	¶	AT LAW
FRED WHEELER HAGEN	¶	
DEFENDANT	¶	

1.

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, on to-wit, July 21, 1948, the Plaintiff was riding in an automobile along highway number 3, a public highway in Baldwin County, Alabama, at a point approximately one mile South of Foley; that the said time and place the Defendant negligently drove an automobile into or against the automobile in which the Plaintiff was riding, and by reason thereof, and as a proximate result and consequence thereof, the Plaintiff was injured as follows:

His nose broken and injured; his chest injured; His knees injured; his elbows and arms injured; He was caused to incur doctor bills; he was caused to incur hospital bills; he was caused to lose time from his work; he was permanently injured; hence this suit.

2.

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on to-wit, July 21, 1948, the Plaintiff was riding in an automobile along highway number 3, a public highway in Baldwin County, Alabama, at a point approximately one mile South of Foley, and then and there the Defendant negligently ran an automobile into or against the automobile in which the Plaintiff was riding, and thereby and as a proximate result and consequence of the negligence of the part of the Defendant, the Plaintiff was injured as follows:

His nose broken and injured; his chest injured;  
His knees injured; his elbows and arms injured;  
He was cause to incur doctor bills; he was  
caused to incur hospital bills; he was caused  
to loose time from his work; he was permanently  
injured; hence this suit;

3.


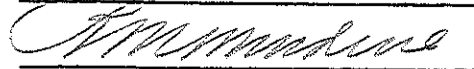
The Plaintiff claims of the Defendant TEN THOUSAND (\$10,000.00) DOLLARS, as damages, and that heretofore on to-wit, July 21, 1948, the Plaintiff was riding in an automobile along highway number 3, a public highway in Baldwin County, Alabama, at a point approximately one mile South of Foley; that the Defendant at said time and place willfully or wantonly injured the Plaintiff by running said automobile which he was then and there driving into, upon, or against the automobile in which the Plaintiff was riding; whereby and as a proximate result and consequence thereof, the Plaintiff was injured as follows:

His nose broken and injured; his chest injured;  
His knees injured; his elbows and arms injured;  
He was caused to incur doctor bills, he was  
caused to incur hospital bills; he was caused  
to loose time from his work; he was permanently  
injured; hence this suit.

4.

The Plaintiff claims of the Defendant the further sum of ONE THOUSAND (\$1000.00) DOLLARS, as damages for that heretofore, on to-wit, July 21, 1947, the Defendant at a point approximately one mile South of Foley, on highway number 3, a public highway in Baldwin County, Alabama, negligently ran an automobile which he was then and there driving along said highway into or against the automobile of the Plaintiff, and as a proximate result of the said negligence of the part of the Defendant, the automobile of the Plaintiff was damaged as follows:

The front wheels bent and broken; the front axel bent; the hood bent; radiator damaged; the body damaged; the frame bent and damaged; the doors damaged; the glasses broken; the said automobile was rendered unfit for use; hence this suit.

  
  
Attorneys for Plaintiff

Plaintiff demands trial by Jury.

Attest  
W. W. W. W. W.  
Attorneys for Plaintiff

Received in Sheriff's  
this 8 day of Oct, 1948  
TAYLOR WILKINS, Sheriff

Executed this 12 day of Oct  
1948 by Serving a Copy of the Within Writ  
on Fred Wheeler Hagen

By Alice J. Duck Sheriff  
D.S.

701252 -  
S. A. MAULDEN

PLAINTIFF

VS

FRED WHEELER HAGEN

DEFENDANT

Defendant's address,  
Sylvauga, Alabama

FILED

OCT 8 1948

ALICE J. DUCK, Receiv

TELEPHONE 2-1601

JACK CRENSHAW  
ATTORNEY AT LAW  
804-806 FIRST NATIONAL BANK BLDG.  
MONTGOMERY, ALA.

October 25, 1948

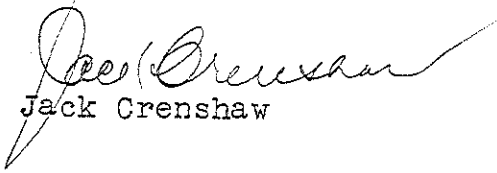
Miss Alice J. Duck  
Clerk, Circuit Court  
Bay Minette, Alabama.

Dear Miss Duck:

Re: S. R. Maulden v.  
Fred W. Hagen

I enclose demurrers in the above matter, which  
please file.

Yours very truly,

  
Jack Crenshaw

JC:CGC

Enclosure.

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