

1260

STATE OF ALABAMA §  
BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LAURA PILLANS, 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 LOPEZ MORROW.

WITNESS my hand this the 9<sup>th</sup> day of October, 1948.

Alice J. Much  
Clerk

=====

LOPEZ MORROW	§	
PLAINTIFF	§	IN THE CIRCUIT COURT OF
VS	§	BALDWIN COUNTY, ALABAMA
LAURA PILLANS	§	AT LAW.
DEFENDANT	§	

1.

The Plaintiff claims of the Defendant THIRTY THOUSAND (\$30,000.00) DOLLARS as damages for that heretofore, on to-wit, August 22, 1948, the Plaintiff was riding on a motorcycle on the highway leading from Daphne to Fairhope, a public highway in Baldwin County, Alabama, in the village of Montrose; that at said time and place the Defendant negligently drove an automobile into or against the motorcycle, on which the Plaintiff was riding; and by reason thereof, and as a proximate result and consequence thereof, the Plaintiff was injured as follows:

His hand was bruised and injured; his right arm was bruised and injured; his face was bruised and injured; his head was bruised and injured; his left shoulder was bruised and injured; his

leg was bruised and injured; his body was bruised and injured; he was injured internally; his foot and ankle ~~was~~ bruised, cut and injured; his right leg broken in two places; he was permanently injured; he was caused to incur doctor bills; he was caused to incur hospital bills; he was caused to lose time from his work;

all to the damage of the Plaintiff, hence this suit.

2.

The Plaintiff claims of the Defendant the sum of THIRTY THOUSAND (\$30,000.00) DOLLARS as damages, for that heretofore, on to-wit, August 22, 1948, the Plaintiff was riding on a motorcycle along the highway, leading from Daphne to Fairhope, a public highway, in Baldwin County, Alabama, within the village of Montrose, and then and there the Defendant negligently ran an automobile into or against the motorcycle on which the Plaintiff was riding, and thereby and as a proximate result and consequence of the negligence on the part of the Defendant the Plaintiff was injured as follows:

His hand was bruised and injured; his right arm was bruised and injured; his face was bruised and injured; his head was bruised and injured; his left shoulder was bruised and injured; his leg was bruised and injured; his body was bruised and injured; he was injured internally; his foot and ankle ~~was~~ bruised, cut and injured; his right leg broken in two places; he was permanently injured; he was caused to incur doctor bills; he was caused to incur hospital bills; he was caused to lose time from work;

all to the damage of the Plaintiff; hence this suit.

3.

The Plaintiff claims of the Defendant the sum of THIRTY THOUSAND (\$30,000.00) DOLLARS, as damages for that heretofore, on to-wit, August 22, 1948, the Plaintiff was riding on a motorcycle along the highway leading from Daphne to Fairhope, a public highway, in Baldwin County, Alabama, within the village of Montrose, that at said time and place the Defendant negligently caused an automobile which she was then and there driving to

collide with the motorcycle on which the Defendant was riding at said time and place, and as a proximate result of the said negligence on the part of the Defendant, the Plaintiff was injured as follows:

His hand was bruised and injured; his right arm was bruised and injured; his face was bruised and injured; his head was bruised and injured; his left shoulder was bruised and injured; his leg was bruised and injured; his body was bruised and injured; he was injured internally; his foot and ankle ~~was~~ bruised, cut and injured; his right leg broken in two places; he was permanently injured; ~~he~~ was caused to incur doctor bills; he was caused to incur hospital bills; he was caused to lose time from work;

all to the damage of the Plaintiff; hence this suit.

4.

The Plaintiff claims of the Defendant THIRTY THOUSAND (\$30,000.00) DOLLARS as damages, for that heretofore on to-wit, August 22, 1948, the Plaintiff was riding on a motorcycle along the highway leading from Daphne to Fairhope, a public highway in Baldwin County, Alabama, within the village of Montrose; that the Defendant at said time and place willfully or wantonly injured the Plaintiff by running an automobile which he was then and there driving into, upon or against the motorcycle on which the Plaintiff was riding; and as a proximate result of the said negligence on the part of the Defendant, at said time and place the Plaintiff was injured as follows:

His hand was bruised and injured; his right arm was bruised and injured; his face was bruised and injured; his head was bruised and injured; his left shoulder was bruised and injured; his leg was bruised and injured; his body was bruised and injured; he was injured internally; his foot and ankle ~~was~~ bruised, cut and injured; his right leg broken in two place; he was permanently injured; he was caused to incur doctor bills; he was caused to incur hospital bills; he was caused to lose time from work;

all to the damage of the Plaintiff; hence this suit.

Defendants address:  
Miss Laura Pillans, 908  
Government Street,  
Mobile, Alabama

Strom  
Attorney for the Plaintiff

*Plaintiff demands a trial by jury*  
*Strom*  
*att. for Plaintiff*

Received in Sheriff's Office  
this 30 day of oct, 1918  
TAYLOR WILKINS, Sheriff

LOPEZ MONROW 908 Dr. 52.

PLAINTIFF

VS

LAURA PILBANS

DEFENDANT

FILED  
OCT 29 1948  
ALICE J. DUCK, Clerk

RECORDED

LOPEZ MORROW,

VS.

LAURA EILLANS,

Plaintiff,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW. NO. 367.

PLEAS

Now comes the Defendant and for plea to Counts 1, 2 and 3 of the Complaint, each separately and severally, says:

1. Not guilty.
2. The Plaintiff himself was guilty of negligence, which proximately contributed to his said damages and injuries.

Now comes the Defendant and for plea to Count 4 of the Complaint, says:

1. Not guilty.

Lyons, Thomas, & Pappas

J. B. Blackburn  
Attorneys for Defendant.

1268  
PLEAS

LOPEZ MORROW,

Plaintiff,

VS.

LAURA PILLANS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW. NO. 367.

Filed 9-22-49

Alvin J. French  
Clerk

copy mailed  
to J.B.B.

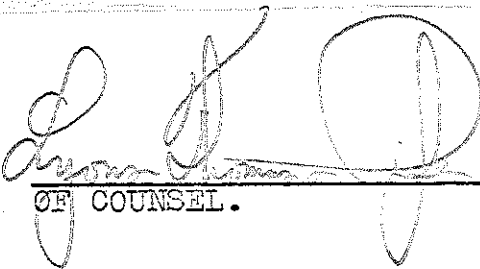
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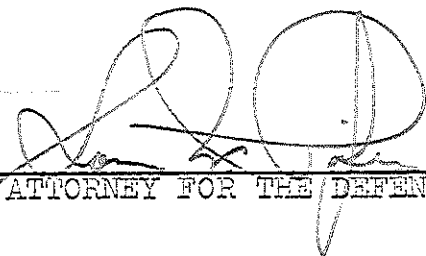
LOPEZ MOROW, PLAINTIFF  
VS.  
LAURA PILLANS, DEFENDANT

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA  
) AT LAW NO. 1260.

Comes now the defendant in the above entitled cause and demurs to plaintiff's complaint and to each and every count thereof separately and severally, and as grounds for said demurrer, sets out the following grounds separately and severally.

1. Said count fails to allege the violation of any duty owed by the defendant to the plaintiff.
2. For aught that appears from said count the defendant did not negligently, nor wilfully, nor wantonly do, nor did she negligently, nor willfully, nor wantonly omit to do, any act resulting in injury to the plaintiff.

  
OF COUNSEL.

  
ATTORNEY FOR THE DEFENDANT

LOPEZ MOROW, PLAINTIFF  
VS.  
LAURA PILLANS, DEFENDANT.

AT LAW No. 1260.

DEMURRER.

1260

FILED  
NOV 10 1948  
ALICE J. DUCK, Clerk

LYONS, THOMAS & PIPES  
ATTORNEYS AT LAW  
517-519 FIRST NATIONAL BANK BUILDING  
MOBILE 8 ALABAMA

11-10-48  
RECORDED