WILLIE MOORE GRAY	)	
PLAINTIFF	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
EDGAR LATHAM RHODES	)	AT LAW
DEFENDANT	)	NO. 1329

Now comes the Defendant and demurs to the Plaintiff's complaint, and to each count thereof, separately and severally says:

1.

Tht said complaint shows that the cause of action is barred by the statute of limitation of one year.

2.

That the complaint shows that the cause of action arose on March 19th, 1948, and suit was not filed until April 2nd, 1949, more than one year after cause of action arose.

S. M. Faeel
Attorney for Defendant.

Defendant demands a trial by Jury

S. M. Faeel
Attorney for Defendant

1329

WILLIE MOORE GRAY

PLAINTIFF

VS.

EDGAR LATHAM RHODES

DEFENDANT

FILED
APR 21 1949
ALICE L. DUCK, Clerk

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE COMMANDED to summon Edgar Latham Rhodes to appear within thrity days from the service of this writ in the Circuit Court, to be held for said County at the place of holding same, then and there to answer the Complaint of Willie Moore Gray .

Witness my hand, this 2nd day of April, 1949.

Alice L. Veach
Clerk

WILLIE MOORE GRAY Plaintiff	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
VS	)	AT LAW.
EDGAR LATHAM RHODES Defendant	)	

Count 1. The Plaintiff claims of the Defendant the sum of FOUR HUNDRED AND FIVE DOLLARS ($405.00) as damages for that on, to-wit: March 19, 1948, in Baldwin County, Alabama, plaintiff was driving his automobile upon a public highway, to-wit, Alabama highway 3, at intersection with Hoffman Road near Summerdale and then and there the defendant negligently parked his car on the highway illegally and thereby was the proximate cause of a wreck in which another auto collided with the defendant and with the plaintiff, said parked auto being the proximate cause of plaintiffs auto being demolished, greatly damaged and rendered less valuable and the Plaintiff received bruises, contusions, lacerations and shock, and caused to lose time from his work, he was rendered less able to work for all of which he claims damages as aforesaid.

Count 2. The plaintiff claims of the Defendant the sum of FOUR HUNDRED AND FIVE DOLLARS ($405.00) as damages for that on, to-wit: March 19, 1948, in Baldwin County, Alabama, plaintiff was driving his automobile upon a public highway, to-wit, Alabama highway 3, at intersection with Hoffman Road near Summerdale and then and there the Defendant being conscious at the time that his conduct in so doing would probably result in injury to the Plaintiff's said car and the occupants thereof, wilfully and wantonly parked his car on the highway illegally and thereby was the proximate cause of a wreck in which another automobile collided with the defendant and with the plaintiff, said parked automobile being the proximate cause of plaintiffs automobile being demolished, greatly damaged and rendered less valuable and the plaintiff received bruises, contusions, lacerations

and shock, and caused to lose time from his work, he was rendered less able to work, for all of which he claims damages as aforesaid.

C. Lois Thompson
Attorney for Plaintiff

4-B-117

Received in Sheriff's Office
this 4 day of April, 1949
TAYLOR WILKINS, Sheriff

Fees $ of GRAY to SHOOKE

Remember are ed. Know all most emit ecel cd Bearer hereunto the King.
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Wilkins for Attorney

NO 1329

Willie Moore Gray

VS.

Edgar Latham Rhodes

Executed 4-13-49 1949
by serving copy of within Summons and
Complaint on

Edgar Latham Rhodes

Taylor Wilkins Sheriff
By Lelleigh Sleadler Deputy Sheriff

FILED
APR 13 1949
ALICE J. DUCK, Clerk