

J. O. DIXON,

Plaintiff,

-vs-

B. F. KUCERA,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

No. 1402

The defendant, B. F. Kucera, for answer to the complaint and each count thereof, separately and severally saeth:-

1. He is not guilty of the matters alleged therein.

  
Attorney for Defendant

RECORDED

## ANSWER

J. O. DIXON,

Plaintiff,

- vs -

B. F. KUCERA,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

NO. 1402

CECIL G. CHASON  
ATTORNEY AT LAW  
MOLEY, ALABAMA

ALICE J. DUCK, Clerk

J. O. DIXON, )  
Plaintiff, ) IN THE CIRCUIT COURT OF  
VS. ) BALDWIN COUNTY, ALABAMA  
B. F. KUCERA, ) AT LAW NO. 1402  
Defendant. )

ORDER SETTING DATE FOR HEARING CAUSE

The parties to this cause having agreed that this cause be set for hearing at 9:30 A. M. on Tuesday, May 23, 1950, it is hereby Ordered that the said cause be and it is hereby set for hearing at 9:30 A. M. on Tuesday, May 23, 1950.

It is further Ordered that the Clerk of this Court shall furnish the attorneys for the respective parties to this suit a copy of this order.

DONE on this the 27<sup>th</sup> day of April, 1950.

J. L. G. M. M. M. M. M.  
Judge.

ORDER SETTING DATE FOR HEARING  
CAUSE.

J. O. DIXON,

Plaintiff,

VS.

B. F. KUCERA,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW. NO. 1402

FILED

APR 27 1950

ALICE A. DUCK, Clerk

ALEXANDER FOREMAN, JR.  
ATTORNEY AT LAW  
207 FIRST NATIONAL BANK BUILDING  
MOBILE 13, ALABAMA

February 16, 1950

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Re: J.O. Dixon vs. B.F. Kucera, At Law #1402  
Gussie Dixon vs. B.F. Kucera, At Law #1401  
Clina Dixon vs. B.F. Kucera, At Law #1403  
Ronnie Dixon vs. B.F. Kucera, At Law #1404

Dear Mrs. Duck:

I shall appreciate your setting the date for the settling of the pleading in the above cases. I have written to Mr. Chason, the attorney for the defendant, requesting that he advise me of a date that would be satisfactory to him, but I have never received a reply to my letter of November 7, 1949, in which I requested the information.

I shall appreciate your not setting the cases for this purpose on Thursday of any week, or on February 21 or February 28, as on those days I will not be able to travel to Bay Minette.

If the cases cannot be set prior to March, I shall appreciate your not setting them on Thursday during that month, or on March 7, March 8, or March 16, as I have other trials in Mobile on those days.

I wish to thank you in advance for your courtesy in this matter, and shall look forward to hearing from you at an early date.

Yours very truly,

  
ALEXANDER FOREMAN, JR.

AF/am

cc: Mr. Cecil G. Chason  
Attorney at Law  
Foley, Alabama

To Judge  
Machburn

ORDER SETTING DATE FOR HEARING  
CAUSE.

J. O. DIXON,

VS.

Plaintiff,

B. F. KUCERA,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW. NO. 1402

FILED

APR 27 1950

ALICE A. DUCK, Clerk

J. O. Nixon,  
Plaintiff

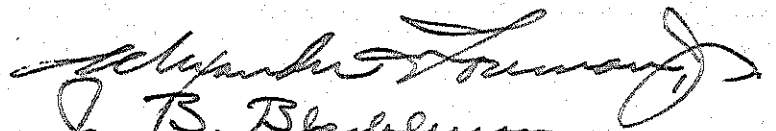
- vs -

B. F. Kucera  
Defendant

In the Circuit Court of  
Baldwin County, Ala

At Law # 1402

Comes now the Plaintiff in the above  
styled cause and for replication to Plea  
"a" heretofore filed in said cause says  
that he joins issue thereon.

  
J. B. Blalock.



Filed; 10-23-50.

J. Fair J. Masliburn Jr.  
Judge.

*Amended plea*

J. O. DIXON,

Plaintiff,

vs.

B. F. KUCERA,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

No. 1402.

The defendant, B. F. Kucera, for answer to Count 2 of  
Complaint sayeth:

A. The plaintiff, J. O. Dixon, was guilty of negligence  
which contributed proximately to the injury complained of in the  
complaint.



Attorney for Defendant.

Filed: 10.23.50.

Jefair J. Mashburn,  
Judge

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon B. F. KUCERA

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

B. F. KUCERA

\_\_\_\_\_, Defendant\_\_\_\_

by J. O. DIXON

\_\_\_\_\_, Plaintiff\_\_\_\_

Witness my hand this 6th day of Sept 1949

Wesley H. H. H., Clerk

RECORDED

No. 14-02

Page \_\_\_\_\_

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

J. O. DIXON

Plaintiffs

vs.

B. F. KUCERA

Defendants

SUMMONS and COMPLAINT

Filed Sept. 6th, 19 49

Alice J. Lusk, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Sept 6, 19 49

Taylor Wilkins, Sheriff

I have executed this summons

this 9-8, 19 49  
by leaving a copy with

B. F. Kucera

Taylor Wilkins, Sheriff

Edleigh Steadha, Deputy Sheriff

J. O. DIXON,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
vs.	:	AT LAW
B. F. KUCERA,	:	NO. _____
Defendant.	:	

COUNT I


The plaintiff claims of the defendant, to-wit, Twenty-five Hundred Dollars (\$2,500.00) as damages for that on, to-wit, the 18th day of June, 1949, the defendant wilfully or wantonly drove an automobile which he was operating on and along Alabama Highway No. 3, at or near its intersection with ~~Holer~~<sup>Holles</sup> Street, which said highway at said point is a public highway in the City of Roberts-  
dale, County of Baldwin, State of Alabama, and which said street at said point is a public street in said City of Roberts-  
dale, County of Baldwin, State of Alabama, into, upon, over or against an automobile in which the plaintiff was riding at said time and place, and as a proximate consequence and result of such wilfulness and wantonness of the defendant at said time and place, the plaintiff received severe personal injuries in this, to-wit: he was bruised about his body in his left hip, a muscle in his left hip was torn aloose; he received abrasions, bruises and cuts on or about his body, and he was otherwise made sick, sore and lame, he suffered great mental anguish and physical pain, and the plaintiff incurred doctor bills and medical expenses in and about curing his said personal injuries; for all of which said injuries and damages the plaintiff claims damages as aforesaid; hence this suit.

COUNT II

The plaintiff claims of the defendant, to-wit, Twenty-five Hundred Dollars (\$2,500.00) as damages for that on, to-wit, the 18th day of June, 1949, the defendant so negligently drove an automobile which he was operating on and along Alabama Highway No. 43, at or near its intersection with ~~Holer~~<sup>Holles</sup> Street, which said highway at said point is a public highway in the City of Roberts-

dale, County of Baldwin, State of Alabama, and which said street at said point is a public street in the City of Robertsdale, County of Baldwin, State of Alabama, as to cause the same to run into, upon, over or against an automobile in which plaintiff was riding at said time and place, and as a proximate consequence and result of such negligence on the part of the defendant at said time and place, the plaintiff received severe personal injuries in this, to-wit: he was bruised about his body in his left hip, a muscle in his left hip was torn aloose; he received abrasions, bruises, and cuts on or about his body, and he was otherwise made sick, sore and lame, he suffered great mental anguish and physical pain, and the plaintiff incurred doctor bills and medical expenses in and about curing his said personal injuries; for allof which said injuries and damages the plaintiff claims damages as aforesaid; hence this suit.

Defendant's address:  
Silverhill, Alabama

  
Attorney for plaintiff  
Alexander Foreman, Jr.  
207 First National Bank Bldg.  
Mobile, Alabama

