

STATE OF ALABAMA
BALDWIN COUNTY

1493

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons JACOB KRAUSE 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 Thomas M. Turner.

WITNESS my hand this the 17th day of May, 1950.

W. J. H. H. H.
Clerk

THOMAS M. TURNER

PLAINTIFF

VS

JACOB KRAUSE

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

I.

The Plaintiff claims of the defendant ONE THOUSAND (\$1000.00) DOLLARS as damages for that heretofore on to-wit, July 16, 1949, the plaintiff was operating his automobile along the highway leading from Elberta to Lillian, a public highway in Baldwin County, Alabama, at a point approximately one and one-half miles East of Elberta in Baldwin County, Alabama, and near the home of the defendant; that the defendant so negligently operated an automobile which he was at said time and place operation along said highway as to cause it to collide with the automobile of the plaintiff, and as a proximate result of the negligence of the defendant at said time and place, the plaintiff was injured as follows:

He was bruised; he was injured internally; he was caused to lose time from his work; he was caused to incur hospital bills; he was caused to incur medical bills; he was caused to incur doctor bills; he was permanently injured;

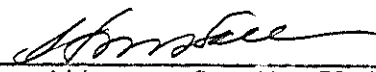
All to the damage to the plaintiff hence this suit.

2.

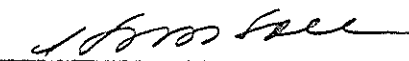
The plaintiff claims of the defendant ONE THOUSAND (\$1000.00) DOLLARS as damages for that heretofore on to-wit: July 16, 1949, the plaintiff was operating his automobile along the road leading from Elberta to Lillian a public highway in Baldwin County, Alabama, at a point approximately one and one-half miles East of Elberta in Baldwin County, Alabama, and near the home of the defendant; that at said time and place the defendant so negligently operated an automobile which he was at said time and place operating along said highway as to cause it to collide with the automobile of the plaintiff, and as a proximate result the automobile of the plaintiff was damaged as follows:

The body was bent; the frame was bent; the classes were broken; the fenders were bent; and the automobile of the plaintiff was otherwise damaged.

All to the damage of the plaintiff hence this suit.


Attorney for the Plaintiff

The Plaintiff demands a trial by jury.


ATTORNEY for the Plaintiff

W 1493

THOMAS M. TURNER
COMPLAINANT
VS
JACOB KRAUSE
DEFENDANT

SUMMONS AND COMPLAINT

RECORDED

Filed 5-4-50
Aric J. French
Clerk

Clenda

Received in Sheriff's Office
this 5th day of May 1950
TAYLOR WILKINS, Sheriff

Executed May - 9 - 1950
By Serving copy on
Jacob Krause

Sheriff
Taylor Wilkins
By
Edleigh Steadman

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

Now comes the Defendant, Jacob Krause, in the above styled cause and demurs to the Plaintiff's complaint and to each count thereof, separately and severally, and assigns the following demurrers each separately and severally:

1. That it does not state a cause of action.
2. It is so vague, uncertain and indefinite as to not properly inform the Defendant as to what he is called upon to defend against.
3. It does not show how in the Defendant was negligent.
4. It does not show save by conclusion how in the Defendant was negligent.
5. It is not shown how in the Plaintiff was injured.
6. Said complaint does not sufficiently describe the alleged injuries to the Plaintiff.

Attorney for Defendant.

1493

DEMURRER

THOMAS M. TURNER,

Plaintiff,

VS.

JACOB KRAUSE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

*Filed 6-7-50
Alice French
Clerk*

RECORDED