


ENID RAYFORD WHITE,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
WILLIAM ALEX BROWN,) AT LAW. NO. 1871
Defendant.)


DEMURRER

Comes the defendant in the above styled cause and demurs to the complaint and to each count thereof, separately and severally, and for grounds therefor assigns, separately and severally, the following:

1. It does not state a cause of action.
2. It does not allege howin plaintiff's automobile was damaged.
3. It does not allege howin plaintiff was injured.
4. It does not allege howin plaintiff was damaged.
5. It does not allege sufficient facts to inform the defendant what he is called upon to defend.
6. It is not shown that the plaintiff suffered any damage as a result of defendant's negligence.
7. It is not shown that the defendant wantonly injured the plaintiff.
8. It does not show, save by conclusion, howin the defendant was negligent.
9. It is not shown that the plaintiff's injury was the proximate result of the defendant's negligence.


Attorney for Defendant.

Defendant demands a trial of said cause by jury.


Attorney for Defendant.

DEMURRED
RECORDED

ENID RAYFORD WHITE,

VS.

Plaintiff,

WILLIAM ALEX BROWN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 1871

FILED
DEC 2 1952
ALICE I. DICK, Clerk

ENID RAYFORD WHITE,
Plaintiff,

-vs-

WILLIAM ALEX BROWN,
Defendant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

COUNT ONE

The Plaintiff claims of the Defendant the sum of One Thousand (\$1,000.00) Dollars, as damages, for that heretofore, on to-wit, the tenth day of September, 1952, Plaintiff's automobile was lawfully being driven along a public highway in Baldwin County, Alabama, namely Alabama Highway 89, and then and there the Defendant negligently ran an automobile truck into, upon or against Plaintiff's automobile, as a proximate consequence whereof, Plaintiff's automobile was damaged, all to her great damage as aforesaid; hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant the sum of One Thousand (\$1,000.00) Dollars, damages, for that heretofore, on to-wit, the tenth day of September, 1952, Plaintiff's automobile was lawfully being driven along a public highway in Baldwin County, Alabama, namely Alabama Highway 89, and then and there the defendant willfully or wantonly injured the Plaintiff's automobile by running an automobile truck into, upon or against Plaintiff's automobile, as a proximate consequence whereof, Plaintiff's automobile was damaged, all to her great damage as aforesaid; hence this suit.

COUNT THREE

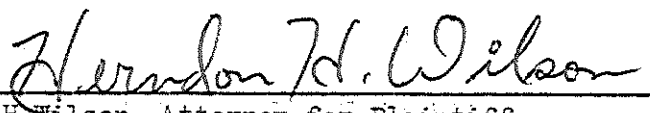
And the Plaintiff claims of the Defendant the sum of Five Hundred (\$500.00) Dollars as damages for that she avers that on, to-wit, the 10th day of September, 1952, the Plaintiff was driving an automobile

- 2 -
COUNT THREE (Cont'd)

upon a public highway in Baldwin County, Alabama, namely Alabama Highway 89, and then and there the Defendant so negligently operated an automobile truck that by reason thereof and as the proximate result and consequence thereof, the said automobile and automobile truck collided, and thereby and as the proximate consequence thereof the Plaintiff received severe personal injuries in this, to-wit: She was made sick and sore, she suffered and continued to suffer great mental anguish and physical pain; she lost time from her work, was caused to incur considerable expense for medical treatment, doctors, etc, in and about the treatment of her said injuries; and will probably have to incur further expenses in the future; for all of which she claims damages as aforesaid; hence this suit.

COUNT FOUR

And the Plaintiff claims of the Defendant the sum of Five Hundred (\$500.00) Dollars damages for that she avers that on, to-wit, the 10th day of September, 1952, the Plaintiff was driving an automobile upon a public highway in Baldwin County, Alabama, namely Alabama Highway 89, and then and there the Defendant wantonly injured the Plaintiff by so wantonly operating an automobile truck, that by reason thereof and as the proximate result and consequence thereof, the said automobile and automobile truck collided, and thereby and as the proximate consequence thereof the Plaintiff received severe personal injuries in this, to-wit: She was made sick and sore, she suffered and continued to suffer great mental anguish and physical pain; she lost time from her work, was caused to incur considerable expense for medical treatment, doctors, etc, in and about the treatment of her said injuries; and will probably have to incur further expenses in the future; for all of which she claims damages as aforesaid; hence this suit.



Herndon H. Wilson, Attorney for Plaintiff
608 Van Antwerp Building
Mobile, Alabama

Defendant's address:

William Alex Brown
Foley, Alabama

RECEIVED
OCT 1 1952

Wash. D.C. H. Reynolds

FILED
OCT 3 1952
ALICE L. DICK, Clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1871

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William Alex Brown

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

William Alex Brown, Defendant

by Enid Rayford White

, Plaintiff

Witness my hand this 3rd day of October 1952.

Alfred. Duck

, Clerk

RECORDED

No. 1871

Page

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

ENID RAYFORD WHITE

Plaintiffs

vs.

WILLIAM ALEX BROWN

Defendants

SUMMONS and COMPLAINT

Filed 10-3-52, 19

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Oct. 3, 1952

Sheriff

I have executed this summons

this 10. Oct, 19 52

by leaving a copy with

William Alex Brown

Sheriff

Deputy Sheriff

GEORGIA-PACIFIC PLYWOOD COMPANY,

PLAINTIFF,

VS:

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

LENARD BUREY GILES,
d/b/a SOUTHERN TREE CABINET &
MILLWORKS CO.,

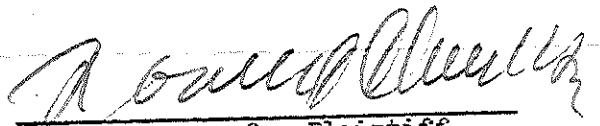
AT LAW.

DEFENDANT.

MOTION FOR JUDGMENT BY DEFAULT

Comes the Plaintiff and moves the Court to render Judgment against the Defendant, in this case, in the principal sum of TWO HUNDRED THREE & 97/100 DOLLARS (\$203.97), together with interest thereon from, to wit: September 26, 1952.

There was attached to and made a part of the Complaint, an itemized statement of account, verified by an affidavit of a competent witness, sworn to before a Notary Public.


Attorney for Plaintiff

1781
RECORDED

MOTION FOR JUDGMENT BY DEFAULT

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

GEORGIA-PACIFIC PLYWOOD COMPANY,

PLAINTIFF,

VS:

LENARD BUREY GILES,
d/b/a SOUTHERN TREE CABINET &
MILLWORKS CO.,

DEFENDANT.

FILED

3-23-53

ALICE L. DUCK, Clerk