MRS. JOHNNIE DEXTER,	I GIRGINI GIRGINI	0.TTD.ET 0.TT
Plaintiff,	IN THE CIRCUIT CO  BALDWIN COUNTY, A	
VS.	LAW SIDE.	
J. W. STEWART and ROBERT STEWART, jointly and	No. 1921.	market )
severally,	I	, market
Defendants.	I	

Come the Defendants in the above styled cause, acting by and through their Attorneys of Record, Chason & Stone, and show unto this Court and unto your Honor as follows:

That the Defendant, Robert Stewart, is a minor 18 years of age and is now in Military Service of the United States of America and therefore unable to properly defend this cause of action and in his absence the Defendant, J. W. Stewart, is unable to properly defend such cause of action.

WHEREFORE, the Defendants pray that this cause of action will be continued until the said Robert Stewart is released from the Military Service of the United States of America or allowed sufficient time from such service in which to properly defend such cause of action.

Attorneys for Defendants.

# SUGGESTION OF MILITARY SERVICE

MRS. JOHNNIE DEXTER,

Plaintiff,

.vs.

J. W. STEWART AND ROBERT STEWART, jointly and severally,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAW SIDE.

NO. 1921.

Filed: February 27, 1953.

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MRS. JOHNNIE DEXTER, Plaintiff,

-vs-

J. W. STEWART and ROBERT STEWART, jointly and severally,

Defendents.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY,
ALABAMA.
AT LAW
CASE NO. 1921

Plaintiff claims of the Defendants the sum of Two Thousand Five Hundred (\$2,500.00) Dollars as damages in this, that heretofore, on to-wit: the 19th day of May, 1952, the Defendant Robert Stewart, the agent, servant or employee of the Defendant J. W. Stewart, while acting within the line and scope of his employment as such, so negligently operated a motor vehicle eastwardly on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately twenty miles west of Foley, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile in which the Plaintiff was riding and which was then being driven in a westwardly direction on said U. S. Highway 90, and as a proximate consequence thereof. Plaintiff was badly out, broken and bruised and otherwise injured about her face, head, chest, legs, her forehead was disfigured and the use of her right leg was permanently impaired, and that she suffered great physical pain and mental anguish, being at the time of this accident pregnant with child, all to the injury of the Plaintiff, hence this suit.

ATTORNEYS FOR PLAINTIFF

Plaintiff respectfully requests that this cause be tried

by a jury.

ATTORNEYS POR PLAINTIFF

DEFERMATE ADDRESS:

Both may be served at Robertedale, Alabama

STATE OF		ALABAMA		
BALDW	UIN	COUNTY		

500

## CIRCUIT COURT

SHERIFF.

TO ANY SHERIFF OF THE STATE OF ALABAMA:
You are hereby commanded to summon ROBERT STEWART to
appear within thirty days from service of this process, in the
Circuit Court of Baldwin County, Alabama, at the place of holding
same, then and there to answer the complaint of MRS. JOHNNIE DEXTER.
Witness: Alice J. Duck, Clerk of said Court, this 32
day of <u>.7e6</u> , 1953.
The state of the s
Attest: desch rench Clerk.
Clerk.
SHERIFF'S RETURN
Received day of, 1953, and
on day of, 1953, I served a copy
of the within Complaint on by service
on

BALDWIN COUNTY STATE OF ALABAKA

of the within Complaint on

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1955, I served a copy

MATTHEW DEXTER,

Plaintiff,

-vs-

J. W. STEWART and ROBERT STEWART, jointly and severally,

Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA.

AT LAW.

CASE NO. 1926

Plaintiff claims of the Defendants the sum of Two Thousand (\$2,000.00) Dollars as damages in this, that heretofore, on to-wit: the 19th day of May, 1952, the Defendant Robert Stewart, the agent, servant or employee of the Defendant J. W. Stewart, while acting within the line and scope of his employment as such, so negligently operated a motor vehicle eastwardly on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately twenty miles west of Foley, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was then being driven in a westwardly direction on said U. S. Highway 90, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged and rendered unfit for use as an automobile and of no further value to the Plaintiff; and the Plaintiff was cut, broken and bruised about the face, head, arms, shoulders, legs and body, and he was permanently disfigured about the eye and his left knee was permanently injured and scarred, and the Plaintiff was required to expend large sums of money in the treatment of his injuries by competent physicians, for hospitalization and medicines, and he was unable to work for a long period of time, all to his injury, hence this suit.

ATTORNEYS YFOR PLAINTIFF

Plaintiff respectfully requests that this cause be tried

by a jury.

DEFENDANTS: ADDRESS: Both may be served at Robertsdale, Alabama. ATTORNEYS FOR PLAINTIFF

STATE OF ALABAMA
BALDWIN COUNTY

#### CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ROBERT STEWART to appear within thirty days from service of this process, in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of MATTHEW DEXTER.

Witness: Alice J. Duck, Clerk of said Court, this day of Aeb, 1953.

Attest: Weicefelich Clerk.

\* \* \* \* \* \*

#### SHERIFF'S RETURN

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on	day of _	¢			1953,	Is	served	a
copy of	the within	Complaint o	n	W			by	
service	on			*				
r						SHI	ERIFF.	

STATE OF ALLEMEA MINDOO KINGILASI

## CINCULT COURT

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complaint of MATTHEW DEXTER.	e to answer the	end ther	do Zomos
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MRS. JOHNNIE DEXTER, Plaintiff,	Ĭ	IN THE CIRCUIT COURT OF
vs.  J. W. STEWART and ROBERT STEWART, jointly and severally,	Ye.	LAW SIDE.
Defendants.	Ĭ	

Come the Defendants in the above styled cause and demur to the Complaint filed in said cause, and assign the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.

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## DEMURRER RECORUED

MRS. JOHNNIE DEXTER,

Plaintiff,

vs.

J. W. STEWART AND ROBERT STEWART, jointly and severally,

Defendants.

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

NO. 1921.

Filed: February 27, 1953.

MRS. JOHNNIE DEXTER,

Plaintiff,

-vs-

J. W. STEWART and ROBERT STEWART, jointly and severally,

Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA.

AT LAW

CASE NO. 1921

Plaintiff claims of the Defendants the sum of Two Thousand Five Hundred (\$2,500.00) Dollars as damages in this, that heretofore, on to-wit: the 19th day of May, 1952, the Defendant Robert Stewart, the agent, servant or employee of the Defendant J. W. Stewart, while acting within the line and scope of his employment as such, so negligently operated a motor vehicle eastwardly on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately twenty miles west of Foley, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile in which the Plaintiff was riding and which was then being driven in a westwardly direction on said U. S. Highway 90, and as a proximate consequence thereof, Plaintiff was badly cut, broken and bruised and otherwise injured about her face, head, chest, legs, her forehead was disfigured and the use of her right leg was permanently impaired, and that she suffered great physical pain and mental anguish, being at the time of this accident pregnant with child, all to the injury of the Plaintiff, hence this suit.

ATTORNEYS FOR PLAINTIFF

Plaintiff respectfully requests that this cause be tried

by a jury.

ATTORNEYS FOR PLAINTIFF

STATE OF ALABAMA ) ( BALDWIN COUNTY )	CIRCUIT COURT
TO ANY SHERIFF OF THE STATE OF ALA	BAMA:
appear within thirty days from ser Circuit Court of Baldwin County, A same, then and there to answer the	labama, at the place of holding
Attest:	* * *
SHERIFF 'S	RETURN
Received day of	, 1953, and
on day of	, 1953, I served a copy
of the within Complaint on	by service
on	SHERIFF.
	OUTUILL .

STATE OF ALABAMA ) ( BALDWIN COUNTY )	CIRCUIT COURT
TO ANY SHERIFF OF THE STATE OF A	LABAMA:
You are hereby command	ed to summon J. W. STEWART to
appear within thirty days from s	ervice of this process, in the
Circuit Court of Baldwin County,	Alabama, at the place of holding
same, then and there to answer t	he complaint of MRS. JOHNNIE
DEXTER.	
Witness: Alice J. Duc	k, Clerk of said Court, this
12th day of feb	, 1953.
Attocts	As I was to
Actest:	Menof-reneto Clerk.
* *	* * * *
SHERIF	F'S RETURN
Received day of	, 1953, and
	, 1953, I served a copy of
the within Complaint on	by service
On •	-

SHERIFF.

Received day of 193
and on 2 day of 193
i served a copy of the within 2 on FAYLOR WILKINS, Sheriff
By Service on State of Sheriff
By Sheriff
By Sheriff

Received in Cheriffe Office

Matthew Defter.

No. Stewart und

Robert Stewart

(G)

Filed 2-13-53 Chiefrench ceup