

CARLOS E. COOPER,  
Plaintiff,

vs

JAMES E. GREEN, JR.  
Defendant


IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NO. 8872

ANSWER


Comes now the Defendant, JAMES E. GREEN, JR. and for answer to the Complaint heretofore filed in this cause says separately and severally as follows:

1. Not guilty.

2. Defendant avers that the Plaintiff, CARLOS E. COOPER, at the time and place complained of in the Complaint was guilty of negligence which proximately contributed to the damages complained of by the Plaintiff in that at the said time and place the Plaintiff, CARLOS E. COOPER, so negligently operated the automobile which he was driving as to cause her to allow the same to run into, over, upon or against the motor vehicle of the Defendant, thereby directly and proximately contributing to the said damages complained of, wherefor Plaintiff ought not to recover in this suit.

  
GEORGE E. McNALLY,  
Attorney for Defendant

Defendant demands trial by jury.

  
GEORGE E. McNALLY,  
Attorney for Defendant,  
JAMES E. GREEN, JR.

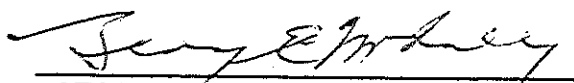
CERTIFICATE OF SERVICE

I do hereby certify that I have on the 20<sup>th</sup> day of September, 1969, served a true copy of the foregoing pleading to CHASON, STONE & CHASON, Attorneys for Plaintiff, Bay Minette, Alabama.

FILED

SEP 20 1969

ALICE J. BOCK CLERK  
REGISTER

  
GEORGE E. McNALLY, Attorney  
for Defendant  
257 St. Anthony Street  
Mobile, Alabama

710.8872  
26.88.016

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James E. Green, Jr., 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 same, then and there to answer the complaint of Carlos E. Cooper.

Witness my hand this 5 day of Sept, 1969.

Alice J. Duck  
Clerk

CARLOS E. COOPER,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

JAMES E. GREEN, JR.,

X

AT LAW

Defendant.

X

8872

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Twelve Hundred Dollars (\$1200.00) as damages for that heretofore on, to-wit, the 25th day of May, 1969, at approximately 8:45 P. M. at a point on U. S. Highway 90 4.3 miles East of the city limits of Robertsdale in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate result of such negligence, the Plaintiff's automobile was damaged in that its hood, radiator support, radiator, fan, front bumper, headlights and left front fender were bent, damaged or broken all to the injury of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Twelve Hundred Dollars (\$1200.00) as damages for that heretofore on, to-wit, the 25th day of May, 1969, at a point on U. S. Highway 90 4.3 miles East of the city limits of Robertsedale in Baldwin County, Alabama, the Defendant wilfully or wantonly operated a motor vehicle in such a manner as to cause or allow the same to collide with the automobile belonging to the Plaintiff thereby wilfully or wantonly injuring the Plaintiff in that his said automobile received the following damages: its hood, radiator support, radiator, fan, front bumper, headlights and left front fender were bent, damaged or broken, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason

**FILED**

SEP 5 1969

**ALICE J. DUCK** CLERK  
REGISTER

RECEIVED

SEP 5 1969

WILSON  
CLERK

Received 8 Day of Sept 19 69  
and on 9 Day of Sept 19 69  
I served a copy of this writ on James E. Green, Jr.  
at James E. Green, Jr.  
by service on \_\_\_\_\_

RAY D. BRIDGES, CLERK  
By W. A. Stewart, Jr. D. E.

SEP 5 1969  
MOBILE, ALA.  
CLERK'S DEPT.

8872  
Lenny 64 60

CARLOS E. COOPER,

Plaintiff,

vs.

JAMES E. GREEN, JR.,

958 Ghent St. Mobile, Ala.  
Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

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FILED

SEP 5 1969

ALICE J. DUCK

CLERK  
REGISTER

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA