

BARBARA E. HOUGHTALING, 0
PLAINTIFF, 1
VS. 1
JAMES MORRIS AND 1
TILLMAN C. BEETHEA, 0
DEFENDANTS. 1

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW
NO 1984.

Come the defendants in the above styled cause and each
of them separately and severally and for answer to the complaint
as filed in this cause pleads as follows:

(1) Not Guilty.

(2) That the allegations of the said complaint are untrue.

HORNE & WEBB
BY:

Douglas J. Webb.
ATTORNEYS FOR DEFENDANTS.

We certify that on this the 23rd day of June, 1953, we
sent a copy of the foregoing pleading to Honorable Telfair
J. Mashburn, Jr., Attorney for plaintiff.

HORNE & WEBB
BY:

Douglas J. Webb.
ATTORNEYS FOR DEFENDANTS.

1984

RECORDED

FILED

JUN 24 1953

ALICE J. DUCK, CLERK

FRANK G. HORNE
DOUGLAS S. WEBB

Law Offices of
Horne & Webb
Attorneys at Law
Atmore, Ala.

June 23, 1953.

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

Dear Mrs Duck:

Enclosed is an answer we wish filed in the case
of Barbara E. Houghtaling vs. James Morris and Tillman C.
Beethea.

As indicated on the answer we mailed a copy of this
answer to opposing counsel this date.

Very truly yours,


DOUGLAS S. WEBB

DSW/iw.

TELFAIR J. MASHBURN, JR.

ATTORNEY AT LAW
DAHLBERG BUILDING
PHONE: 4661

MOBILE, ALA.
S U M M O N S

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. 0

You are hereby commanded to summon JAMES MORRIS AND TILLMAN C. BEETHA 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 BARBARA E. HOUGHTALING.

Witness my hand this 6th day of May, 1953.

Alfred H. Houch
CLERK.

BARBARA E. HOUGHTALING,	0	
	0	
Plaintiff,	0	
	0	IN THE CIRCUIT COURT OF
VS.	0	
	0	BALDWIN COUNTY, ALABAMA.
JAMES MORRIS AND	0	
	0	AT LAW.
TILLMAN C. BEETHA,	0	
	0	NO. _____
Defendants.	0	

C O M P L A I N T.

C O U N T O N E.

The Plaintiff claims of the Defendants \$1,500.00 as damages for that on, to-wit, the 3rd day of February, 1953, at about 6:30 O'clock, A. M., at a point about ten miles East of Mobile, Alabama, near the Blakely River, on U. S. Highway No. 90, a Public Highway in Baldwin County, Alabama, the Defendant, JAMES MORRIS, an agent, servant or employee of the Defendant, TILLMAN C. BEETHA, while acting within the line and scope of his employment, so negligently operated a motor vehicle then and there, as to cause said motor vehicle to run over, upon or against an automobile belonging to the plaintiff, and in which Plaintiff was then and there riding; and plaintiff avers that as a proximate consequence thereof numerous parts her said automobile, both front and rear, were broken up and damaged, rendering it less useful and less valuable to the plaintiff; that she was deprived of the use of her said automobile for a long period of time; and Plaintiff further avers that she received severe personal injuries as a proximate conse-

TELFAIR J. MASHBURN, JR.

ATTORNEY AT LAW
DAHLBERG BUILDING
PHONE: 4661
BAY MINETTE, ALA.

quence thereof she received severe personal injuries; she was made sick, sore, lame and disordered; all to her damage in the sum aforesaid. And Plaintiff avers that all of her said injuries were proximately caused by the said negligence of the said defendant, JAMES MORRIS, an agent, servant, or employee of the defendant, TILLMAN C. BENTHEA, while acting within the line and scope of his employment as such agent, servant, or employee in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid; wherefore, the plaintiff sues.

Telfair J. Mashburn, Jr.
Attorney for Plaintiff.

Plaintiff respectfully requests that this cause be tried by a jury.

Telfair J. Mashburn, Jr.

FILED

VS. ITAM.

ALDWIN COUNTY, ALABAMA.

IN THE CIRCUIT COURT OF

UNKNOWN AND COMPLAINING.

Defendants.

TILLMAN C. BENTHEA,

JAMES MORRIS AND

AS.

Plaintiff,

BARBARA E. HOUGHTALING,

ITAM NO. 1884

TELFAR J. MASHBURN, JR.

ATTORNEY AT LAW
DAHLBERG BUILDING
PHONE: 4681
BAY MINETTE, ALA.

quence thereof she received severe personal injuries; she was
made sick, sore, lame and disordered; all to her damage in the sum
aforesaid. And Plaintiff avers that all of her said injuries were
proximately caused by the said negligence of the said defendant,
JAMES MORRIS, an agent, servant, or employee of the defendant,
TILMAN C. BEETHA, while acting within the line and scope of his
employment as such agent, servant, or employee in and about the
negligent operation of said motor vehicle at the time and place and
on the occasion aforesaid; wherefore, the Plaintiff sues.

Telfar J. Mashburn, Jr.
Attorney for Plaintiff.

Plaintiff respectfully requests that this cause be tried by

a jury.

LAW NO. 1984

BARBARA E. HOUGHTALING,

Plaintiff,

VS.

JAMES MORRIS AND

TILMAN C. BEETHA,

Defendants.

SUMMONS AND COMPLAINT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED

PAID 0.00


MAILED 1. 1984 Clerk

S U M M O N S

STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. 0

You are hereby commanded to summon JAMES MORRIS AND TILLMAN C. BEETHEA 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 BARBARA E. HOUGHTALING.

Witness my hand this 6th day of May, 1953.


C L E R K.

BARBARA E. HOUGHTALING,	0	
	0	
Plaintiff,	0	
	0	
VS.	0	IN THE CIRCUIT COURT OF
	0	
JAMES MORRIS AND	0	BALDWIN COUNTY, ALABAMA.
	0	
TILLMAN C. BEETHEA,	0	AT LAW.
	0	
Defendants.	0	NO. _____

C O M P L A I N T.
C O U N T O N E.

The Plaintiff claims of the Defendants \$1,500.00 as damages for that on, to-wit, the 3rd day of February, 1953, at about 6:30 O'clock, A. M., at a point about ten miles East of Mobile, Alabama, near the Blakely River, on U. S. Highway No. 90, a Public Highway in Baldwin County, Alabama, the Defendant, JAMES MORRIS, an agent, servant or employee of the Defendant, TILLMAN C. BEETHEA, while acting within the line and scope of his employment, so negligently operated a motor vehicle then and there, as to cause said motor vehicle to run over, upon or against an automobile belonging to the plaintiff, and in which Plaintiff was then and there riding; and plaintiff avers that as a proximate consequence thereof numerous parts her said automobile, both front and rear, were broken up and damaged, rendering it less useful and less valuable to the plaintiff; that she was deprived of the use of her said automobile for a long period of time; and Plaintiff further avers that she received severe personal injuries as a proximate conse-

quence thereof she received severe personal injuries; she was made sick, sore, lame and disordered; all to her damage in the sum aforesaid. And Plaintiff avers that all of her said injuries were proximately caused by the said negligence of the said defendant, JAMES MORRIS, an agent, servant, or employee of the defendant, TILLMAN C. BEETHEA, while acting within the line and scope of his employment as such agent, servant, or employee in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid; wherefore, the plaintiff sues.

J. Fair H. Madlbury Jr.
Attorney for Plaintiff.

Plaintiff respectfully requests that this cause be tried by a jury.

J. Fair H. Madlbury Jr.

Received in Sheriff's Office
this 6 day of May 1953
TAYLOR WILKINS Sheriff

executed 5-7-53
by serving copy of within Summons and
Complaint on
Tillman C. Beetha

Taylor Wilkins Sheriff
H. F. Hall Deputy Sheriff

not found as to
James Morris
H. F. Hall
P. S.

in Fla.

opinion of the
jury damages awarded
in amount of \$750.00
for plaintiff
Pete Hufford

LAW NO. 1984

RECORDED

BARBARA E. HOUGHTALING,
Plaintiff,

VS.

JAMES MORRIS AND
TILLMAN C. BEETHEA,
Defendants.

SUMMONS AND COMPLAINT.

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

FILED

MAY 8 1953

ALICE J. DUCK, Clerk
TELFAIR J. MASHBURN, JR.
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

D. G. S. live at Daphne