

ANSWER

WILLIAM H. GORAM,

Plaintiff,

VS.

BEN D. BISHOP,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW
CASE NO. 1996.

Comes now Ben D. Bishop, Defendant in the above styled cause, and for answer to the Complaint filed in said cause says:

1. Not guilty.

2. That Plaintiff was guilty of negligence which contributed proximately to the injuries complained of in the Complaint, in that on said day and date the Plaintiff ^{So} ~~was~~ negligently operating^{ed} the automobile he was driving on U. S. Highway #90 at the point where it intersects with the Belforest-Loxley Farm to Market Road, both of which are public roads in Baldwin County, Alabama, as to cause or allow said automobile to collide with or run against the automobile the Defendant, Ben D. Bishop, was operating, which was then being driven in an easterly direction on said Belforest-Loxley Farm to Market Road, which negligence proximately contributed to the Plaintiff's alleged damages and injuries.

WILTERS & BRANTLEY

By: Albert M Brantley

Attorneys for Defendant

Defendant demands a trial by jury.

WILTERS & BRANTLEY

By: Albert M Brantley

Attorneys for Defendant

ANSWER

WILLIAM H. GORAM,

Plaintiff,

VS.

BEN D. BISHOP,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 1996.

FILED
MAY 27 1953
ALICE J. DUCK, Clerk

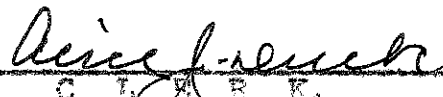
TELFAIR J. MASHBURN, JR.

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

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

You are hereby commanded to summon BEN D. BISHOP 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 WILLIAM H. GORAM.

Witness my hand this 15th day of May, 1953.


C L E R K.

C O M P L A I N T.

WILLIAM H. GORAM,	0	
	0	
Plaintiff,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
BEN D. BISHOP,	0	AT LAW.
	0	
Defendant.	0	NO. _____.

C O U N T O N E.

The Plaintiff claims of the Defendant the sum of \$750.00 as damages for that, heretofore, on to-wit: Sunday, the 29th day of March, 1953, at about 9:00 A. M., the Plaintiff's automobile was being operated along and upon U. S. Highway No. 90, a public road or highway in Baldwin County, Alabama, at a point approximately five miles west of Robertsdale, Alabama, where said highway intersects the Bell Forest to Loxley Farm Road, and the defendant, BEN D. BISHOP, so negligently operated a motor vehicle then and there as to cause said motor vehicle he was operating to collide with plaintiff's automobile; and plaintiff avers that as a proximate consequence thereof his said automobile was greatly damaged and made much less valuable to him: The front bumper, front axle, the fenders, the doors, the steering gear, and other parts of the plaintiff's automobile were broken, bent, smashed, or otherwise damaged and injured, the plaintiff was deprived of the use of his said automobile for a long period of time, all to the damage of the

TELEFAIR J. MASHBURN, JR.

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

plaintiff as aforesaid. And Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the defendant, in that he negligently caused, allowed or permitted his said motor vehicle to collide with plaintiff's automobile; wherefore he sues.

COMMONS AND COMPLAINT.

MO.

VI. IV.

EVADIM COMMLX' ATYBAM
IN THE CIRCUIT COURT

Defendant

DEA D. BISHOP

AS

Plaintiff

WILLIAM H. GORAN

2801594

W 1996

WILLIAM H. GORAM,

Plaintiff,

VS.

BEN D. BISHOP,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

NO. _____

SUMMONS AND COMPLAINT.

ALL, a subpoenaed, therefore he was
fired on defendant his said motor vehicle to collide with him
reference of the defendant, in fact he negligently caused, at
cause to his said automobile were proximately caused by the
defendant as stated, and defendant agrees that his said

LESLIE J. WASHBURN, JR.
DANIELSON BUILDING
WALTON AVENUE
MOBILE, ALABAMA
BY MICHAEL, IVY
PHONE: 4681

STATE OF ALABAMA, 0
 0
COUNTY OF BALDWIN. 0

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon BEN D. BISHOP 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 WILLIAM H. GORAM.

Witness my hand this 19th day of May, 1953.

Deicef. n. n. n.
C L E R K.

C O M P L A I N T.

WILLIAM H. GORAM,	0	
	0	
Plaintiff,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
BEN D. BISHOP,	0	AT LAW.
	0	
Defendant.	0	NO. _____.

C O U N T O N E.

The Plaintiff claims of the Defendant the sum of \$750.00 as damages for that, heretofore, on to-wit: Sunday, the 29th day of March, 1953, at about 9:00 A. M., the Plaintiff's automobile was being operated along and upon U. S. Highway No. 90, a public road or highway in Baldwin County, Alabama, at a point approximately five miles west of Robertsdale, Alabama, where said highway intersects the Bell Forest to Loxley Farm Road, and the defendant, BEN D. BISHOP, so negligently operated a motor vehicle then and there as to cause said motor vehicle he was operating to collide with plaintiff's automobile; and plaintiff avers that as a proximate consequence thereof his said automobile was greatly damaged and made much less valuable to him: The front bumper, front axle, the fenders, the doors, the steering gear, and other parts of the plaintiff's automobile were broken, bent, smashed, or otherwise damaged and injured, the plaintiff was deprived of the use of his said automobile for a long period of time, all to the damage of the

plaintiff as aforesaid. And Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the defendant, in that he negligently caused, allowed or permitted his said motor vehicle to collide with plaintiff's automobile; wherefore he sues.

Jellair A. Marshall, Jr.
ATTORNEY FOR PLAINTIFF.

Received in Sheriff's Office
this 8 day of May 1953
TAYLOR WILKINS, Sheriff

7221996

WILLIAM H. GORAM,

Plaintiff,

VS.

HEN D. BISHOP,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

SUMMONS AND COMPLAINT.

FILED
MAY 18 1953
ALICE J. DUCK, Clerk

TELFAIR J. MASHBURN, JR.

ATTORNEY-AT-LAW

BAY MINETTE, ALABAMA

DEF'S ADDRESS: FAIRHOPE, ALA.

Received _____ day of _____ 19____
and on 22 day of May 1953
I served a copy of the within
on _____

By service on Ben D Bishop

TAYLOR WILKINS, Sheriff

By Ed Leigh Steadman

We the jury find
in favor of the
Plaintiff & place
damages at Five
hundred dollars
(500⁰⁰)

George Thomas
Foreman