

PAUL E. HUBIS, X  
Plaintiff, X  
vs. X  
WILLIAM D. COUNTRYMAN, X  
Defendant. X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW CASE NO. 8963

DEMURRER

Comes now the Defendant in the above styled cause, by his attorneys, and demurs to the Complaint heretofore filed against him, and assigns the following separate and several grounds in support thereof:

1. The Complaint fails to state a cause of action.
2. The Complaint fails to allege with sufficient particularity the damages allegedly sustained by the Plaintiff.
3. The Complaint fails to allege how, or in what manner, the automobile of the Plaintiff was damaged.

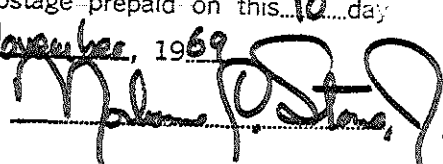
Respectfully submitted,

CHASON, STONE & CHASON

By:   
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 10 day of November, 1969



**FILED**

NOV 10 1969

ALICE J. DUCK  
CLERK  
REGISTER

N.S.

89623

FILED

NOV 10 1969

ALICE J. BARK CLERK  
REGISTER

PAUL E. HUBIS, : IN THE CIRCUIT COURT OF  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
vs. :  
WILLIAM D. COUNTRYMAN, :  
Defendant. : CASE NO. 8963

AMENDED COMPLAINT

Comes now the plaintiff in the above-styled cause and amends its complaint by adding thereto the following Count Two:

Count Two

The plaintiff claims of the defendant the sum of EIGHT HUNDRED NINETY-FIVE AND NO/100ths (\$895.00) DOLLARS, as damages, for that heretofore and on, to-wit, February 14, 1969, the plaintiff's motor vehicle was being operated on or upon Hall Avenue, a public street in Bay Minette, Baldwin County, Alabama, at a point where said Hall Avenue crosses Fifth Street, a public street in Bay Minette, Alabama, and that the defendant so negligently operated his motor vehicle at the time and place aforesaid, so as to cause or allow the same to collide with the plaintiff's motor vehicle, and as a proximate result of the defendant's negligence as aforesaid, plaintiff's motor vehicle was broken, bent, smashed and damaged, in that it was damaged on the right side from the front cowl back into the right rear quarter; the right door was damaged and right quarter was damaged, hence this suit.



THOMAS G. GREAVES, III  
Trial Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at:

11 East Fourth Street  
Bay Minette, Alabama

FILED

JUN 2 1969

ALICE J. DUCK CLERK  
REGISTER

8962

PAUL E. HUBIS, X  
Plaintiff, X IN THE CIRCUIT COURT OF  
vs. X BALDWIN COUNTY, ALABAMA  
WILLIAM D. COUNTRYMAN, X AT LAW CASE NO. 8963  
Defendant. X

DEMURRER

Comes now the Defendant in the above styled cause, by his attorneys, and demurs to the Complaint heretofore filed against him, as last amended, and reassigns, separately and severally, the separate and several grounds set forth in his demurrer to the original Complaint, in support thereof.

Respectfully submitted,

CHASON, STONE & CHASON

By: Edward E Ball  
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 4th day of Dec, 1969.

Edward E Ball

**FILED**

DEC 4 1969

**ALICE J. DUCK** CLERK  
REGISTER

8963

FILED

DEC 4 1969

ALICE J. DUCK  
CLERK REGISTER

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON  
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

December 1, 1969

MAILING ADDRESS:  
P. O. DRAWER C  
OR P. O. BOX 123

CABLE ADDRESS:  
HAB  
TELEPHONE  
432-5511  
AREA CODE 205

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
ALEX F. LANKFORD, III  
EDMUND R. CANNON  
LYMAN F. HOLLAND, JR.  
J. THOMAS HINES, JR.  
DONALD F. PIERCE  
LOUIS E. BRASWELL  
HAROLD D. PARKMAN  
G. PORTER BROCK, JR.  
HARWELL E. COALE, JR.  
STEPHEN G. CRAWFORD  
JERRY A. MCDOWELL  
W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
A. CLAY RANKIN, III  
EDWARD A. HYNDMAN, JR.  
MICHAEL D. KNIGHT  
G. HAMP UZZELLE, III  
THOMAS GUY GREAVES, III

Clerk's Office  
Circuit Court  
Baldwin County Courthouse  
Bay Minette, Alabama

Dear Sir:

I am enclosing herewith an amended complaint  
in the case of Hubis v. Countryman.

Please file this as a matter of record and  
acknowledge receipt and filing by signing the enclosed  
tissue copy of this letter.

Very truly yours,



Thomas G. Greaves, III

TGG.sp  
Enc.

FILED

DEC 2 1969


ALICE J. DICK

C. K.  
REC'D

PAUL E. HUBIS, ) IN THE CIRCUIT COURT OF  
Plaintiff, ) BALDWIN COUNTY, ALABAMA  
VS. )  
WILLIAM D. COUNTRYMAN, )  
Defendant. ) CASE NO. 8963

COMPLAINT

The plaintiff claims of the defendant the sum of EIGHT HUNDRED NINETY-FIVE AND NO/100 (\$895.00) DOLLARS, as damages, for that heretofore and on, to-wit, February 14, 1969, the plaintiff's motor vehicle was being operated on or upon Hall Avenue, a public street in Bay Minette, Baldwin County, Alabama, at a point where said Hall Avenue crosses Fifth Street, a public street in Bay Minette, Alabama, and that the defendant so negligently operated his motor vehicle at the time and place aforesaid, so as to cause or allow the same to collide with the plaintiff's motor vehicle, and as a proximate result of the defendant's negligence as aforesaid, plaintiff's car was broken, bent, smashed and damaged, hence this suit.

  
THOMAS G. GREAVES, III  
Trial Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON  
30th Floor, First National Bank Building  
Mobile, Alabama 36601

Defendant may be served at:

11 East Fourth Street  
Bay Minette, Alabama

FILED

OCT 30 1969

ALICE J. DUCK CLERK  
REGISTER



SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8963

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William D. Countryman

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 D. Countryman

Defendant.....

by Paul E. Hubis

Plaintiff.....

Witness my hand this 30th day of October 19 69.

Alice J. Luck Clerk

24/11-3-69