ETHEL F. THOMAS,

Flaintiff,

Vs

PRINCE E.GRIFFEN,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA CASE NO. 8975

AT LAW

ANSWER

Comes now the Defendant in his own proper person in the above styled cause, and for Answer to the Bill of Complaint filed herein, assigns the following separately and severally, as to the two counts thereof:

Count One

The Defendant denies each, every and all of the allegations of said Bill of Complaint, and demands strict proof thereof.

Count Two

The Defendant denies each, every and all of the allegations of said Bill of Complaint, and demands strict proof thereof.

And further, Defendant avers that the Plaintiff has brought this suit with malice aforethought, and without probable cause therefor, to cause personal injury, harassment and vexation against the Defendant; and the Defendant represents to this Honorable Court that he has in fact suffered personal injury, harassment and vexation, and losses of time and money, proceeding from the Plaintiff's said action, for which the Defendant cross-claims the sum of FIVE THOUSAND DOLLARS damages therefor, and claims punitive damages herein.

Prince E. Griffin

Defendant respectfully demands trial by jury.

Prince E. Griffin

Dated this the lat day of December, 1969.

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ETHEL F. THOMAS

IN THE CIRCUIT COURT OF

PLAINTIFF,

: BALDWIN COUNTY, ALABAMA

VS.

:

AT LAW

PRINCE E. GRIFFEN,

:

DEFENDANT.

CASE NO: 8975

DEMURRER

Comes now Prince E. Griffen and files this demurrer to the plaintiff's complaint and sets down and assigns the following grounds separately and severally.

- 1. The plaintiff has failed to state a cause of action against the defendant in his complaint.
- 2. The plaintiff has failed to allege that any damage or injury she suffered was probably caused by the defendant.
- 3. The allegations alleged in the plaintiff's complaint are mere conclusions of the pleader.

Laylor Wilkins, Jr. Attorney for Defendant

Defendant respectfully demands a trial of this cause by jury.

Yaylor Wilkins, Jr. Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this day of 19 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

DEC # 19-69

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IN THE CIRCUIT COURT OF ETHEL F. THOMAS, :

> BALDWIN COUNTY, ALABAMA PLAINTIFF,

AT LAW VS

PRINCE E. GRIFFEN,

CASE NO: 8975 DEFENDANT.

PLEA

Comes now the defendant, PRINCE E. GRIFFEN, separately and severally, and files this plea to the plaintiff's complaint and to each count thereof separately and severally:

The defendant denies each and every allegation of the plaintiff's complaint and demands strict proof thereof.

TT

The defendant for further answer to plaintiff's complaint avers that the plaintiff has failed to suffer any damage and has caused the defendant to defend said cause, thereby causing loss of time and money from his employment, and that the complaint is brought for the purpose of wrongfully and maliciously harassing the defendant, and for which the plaintiff claims punitive damages.

torney for Défendant

torney for Defendant

I, the undersigned Taylor Wilkins, Jr., do hereby certify that I have on this the day of September, 1970, forwarded a true and exact copy of the foregoing plea to Mr. John V. Duck, attorney of record for the plaintiff, by mailing the same in the United States Post Office, properly addressed, with the postage paid thereon.

Done this the M day of September,

SEP 15 1970

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REGISTER

JOHN V. DUCK Attorney at Law P. O. DRAWER Y - FAIRHOPE, ALABAMA

P. O. DRAWER 1-17	
MESSAGE	REPLY
Mrs. Alice J. Duck	ATE
Bay Minette, Ala.	2975
October 30, 1969	
Re: Ethel F. Thomas vs. Prince E. Griffen	
Dear Mrs. Duck: Enclosed please find Bill of Complaint to	
be filed, together with copy of same and	
Summons to be served.	
sincerely,	
Champ, the contraction of the co	
	SIGNED

ETHEL F. THOMAS, IN THE CIRCUIT COURT OF Plaintiff, BALDWIN COUNTY, ALABAMA ٧s. AT LAW 8975 PRINCE E. GRIFFEN, Defendant

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages for that heretofore on, to-wit: the 22nd day of September, 1969 the Defendant wrongfully, vexatiously and maliciously caused to be issued out of the Justice Court of Lanier P. Angle in Fairhope, Alabama, a Writ of Garnishment against Plaintiff, and caused the same to be served on the Grand Hotel Company, when in fact, there is no Grant Hotel Company, but in fact the Grand Hotel Development Corporation, Plaintiff's employer, for the purpose of harassing Plaintiff, and Plaintiff avers that, by reason of such wrongful issuance and service of such Garnishment as aforesaid, she has suffered the following damages and injuries: That she has become nervous and upset, that she is now under a doctor's care for a nervous disorder, that the Grand Hotel Development Corporation is now withholding the sum of ONE HUNDRED SIXTY-SEVEN AND 51/100 (\$167.51) DOLLARS from her wages, that she was caused great humiliation, was caused to spend money for fees of an attorney, to lose time from her work because of the emotional upset, and to be put into a bad light with her employer, and the Plaintiff claims punitive damages.

COUNT TWO

Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages, and as cause of action, avers that the Defendant procured and had issued from the Justice Court of Lanier P. Angle, a Justice of the Peace in Precinct Ten, Baldwin County, Alabama, a Writ of Garnishment on, to-wit: the 22nd day of September, 1969, and had the same levied and served agains \mathfrak{t} the Plaintiff's wages in the hands of and owing to the Plaintiff by the Grand Hotel Development Corporation, Garnishee, under the

name and style of a suit in said Justice Court aforesaid, Prince E. Griffen, Assignee of First National Bank of Fairhope, Alabama, Plaintiff, vs. Ethel F. Thomas, Defendant, Grand Hotel Company, Garnishee, and the Plaintiff avers that at the time of said Writ of Garnishment being issued, the Plaintiff did not owe the Defendant any sum, and that the Defendant knowingly, wilfully or intentionally procured said Writ of Garnishment to be issued and levied upon the Plaintiff's wages for the purpose of extorting from her money to about the sum of ONE HUNDRED SIXTY-SEVEN AND 51/100 (\$167.51) DOLLARS to the Plaintiff's damages in this: That she has become nervous and upset, that she is now under a doctor's care for a nervous disorder, that the Grand Hotel Development Corporation is now withholding the sum of ONE HUNDRED SIXTY-SEVEN AND 51/100 (\$167.51) DOLLARS from her wages, that she was caused greal humiliation, was caused to spend money for fees of an attorney, to lose time from her work because of the emotional upset, and to be put into a bad light with her employer, and the Plaintiff claims punitive damages.

ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands a trial by jury.

ORNEY FOR PLAINTIFF

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,	PR	INCE E.	GRIFFEN				Defendant
by	ЕТ	HEL F. T	HOMAS			***************************************	
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7/11-5-69

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8975 Page	Defendant lives at
STATE OF ALABAMA	Chiffen Standard Service Statis
Baldwin County	corner Fairhope Ave. & Church
	St., Fairhone, Ala.
CIRCUIT COURT	Received In Office
	19 19
ETHEL F. THOMAS	WILLIAM Sheriff
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Plaintiffs	
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PRINCE E. GRIFFEN	Prince En Buddelle
Defendants	10 10
COMPLAINT	
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JOHN V. DUCK	
Plaintiff's Attorney	Sheriff
	11601
Defendant's Attorney	Deputy Sheriff
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	J. M. Degra
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