TELFAIR J. MASHBURN, JR.
ATTORNEY AT LAW
DAHLBERG BUILDING
PHONE: 4661
BAY MINETTE, ALA.

ETHEL A. BRADLEY, Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA.
Mrs. PAT BROCK, Defendant.	)	AT LAW.
	)	NO. 2032

A N S W E R.

1. Comes the defendant and for answer to the plaintiff's complaint and each and every count thereof, separately and severally, says that she is not guilty of the matters and things alleged therein.

2. For further answer to the Complaint heretofore filed in said cause by the plaintiff, and each count thereof, separately and severally, the defendant says that on the occasion and at the time and place alleged in the complaint, the plaintiff did assault the defendant, and said defedant struck only in defense of herself and used no more force than was reasonably necessary for that purpose, and committed no assault upon the plaintiff except in self-defense, and that defendant was free from fault in bringing on the difficulty.

Telfair J. Mashburn Jr.
Attorney for Defendant.

I certify that I have this day, the 24th day of July, 1953, mailed a copy of the above pleading to Groves C. Hillard, Annex First National Bank Building, Mobile, Alabama, in a properly stamped envelope; and that Groves C. Hillard is the Attorney of Record for for the Plaintiff in this cause.

Telfair J. Mashburn Jr.
Attorney for Defendant.

THELMAIR J. MASHBURN, JR.
ATTORNEY AT LAW
DAHLBERG BUILDING
PHONE: 4661
BAY MINETTE, ALA.

ETHEL A. HEADLEY,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA.
VS.	)	AT LAW.
Mrs. PAT BROCK,	)	NO. 2032
Defendant.	)	

A N S W E R.

1. Comes the defendant and for answer to the plaintiff's complaint and each and every count thereof, separately and severally, says that she is not guilty of the matters and things alleged therein.

For further answer to the complaint heretofore filed said cause by the plaintiff, to each count thereof, separately and severally, the defendant says that on the occasion and at the time and place alleged in the complaint the plaintiff did assault the defendant, and said defendant struck only in defense of herself and used no more force than was reasonably necessary for that purpose, and committed no assault upon the plaintiff except in self-defense, and that defendant was free from fault in bringing on the difficulty.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
AT LAW.
NO. 2032
ETHEL A. HEADLEY, Plaintiff,
Vs.
MRS. PAT BROCK, Defendant.
ANSWER.

FILED
JUL 4 1973
CLERK

Thelmair J. Mashburn Jr.
Attorney for Defendant.

I certify that I have this day, the 24th day of July, 1973, mailed a copy of the above pleading to Grover C. Hillard, Inner First National Bank Building, Mobile, Alabama, in a properly stamped envelope; and that Grover C. Hillard is the Attorney of Record for for the Plaintiff in this cause.

Thelmair J. Mashburn Jr.
Attorney for Defendant.

ETHEL A.BRADLEY,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA.
Mrs. PAT BROCK,	)	AT LAW.
Defendant.	)	NO. 2032

A N S W E R.

1. Comes the defendant and for answer to the plaintiff's complaint and each and every count thereof, separately and severally, says that she is not guilty of the matters and things alleged therein.

2. For further answer to the Complaint heretofore filed in said cause by the plaintiff, and each count thereof, separately and severally, the defendant says that on the occasion and at the time and place alleged in the complaint, the plaintiff did assault the defendant, and said defedant struck only in defense of herself and used no more force than was reasonably necessary for that purpose, and committed no assault upon the plaintiff except in self-defense, and that defendant was free from fault in bringing on the difficulty.

Jeffair A. Mashburn, Jr.
Attorney for Defendant.

I certify that I have this day, the 24th day of July, 1953, mailed a copy of the above pleading to Groves C. Hillard, Annex First National Bank Building, Mobile, Alabama, in a properly stamped envelope; and that Groves C. Hillard is the Attorney of Record for for the Plaintiff in this cause.

Jeffair A. Mashburn, Jr.
Attorney for Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 2032

****

ETHEL A. BRADLEY,

Plaintiff,

Vs.

MRS. PAT BROCK,

Defendant.

****

ANSWER.

FILED
JUL 24 1953
ALICE J. DUCK, Clerk

Copy has been mailed to

ETHEL A. BRADLEY	*	IN THE CIRCUIT COURT OF
Plaintiff	*	BALDWIN COUNTY, ALABAMA
-vs-	*	
MRS. PAT BROCK	*	
Defendant		AT LAW NO. _____

COUNT ONE

Plaintiff claims of the defendant the sum of FIFTEEN HUNDRED DOLLARS ($1500.00) damages for an assault and battery committed by the defendant on the plaintiff in Loxley, Alabama, and upon the premises of the defendant, plaintiff having a right to be on said premises, on Wednesday afternoon, March 18, 1953.

COUNT TWO

Plaintiff claims of the defendant the sum of FIFTEEN HUNDRED DOLLARS ($1500.00) as damages, for an assault and battery committed by the defendant upon the person of the plaintiff on, to-wit, the 18th day of March, 1953, and plaintiff alleges that said defendant did, on such date, wrongfully and unlawfully jerk her around, grab her by the shoulder and push her, then did raise her foot and kick her, and did beat, curse and attempt to further injure the plaintiff by throwing or casting bottles or glassware in the direction of the plaintiff with the intent and purpose of striking her, and as a proximate consequence thereof she was made sick, sore, and suffered bruises about her body.

She suffered physical and mental pain and anguish, indignities, insults, humiliations, fright and injuries to her feelings, and was compelled to lose time from her work, all to her damage as aforesaid, hence this suit.

Groves C. Hillard
GROVES C. HILLARD
Attorney for Plaintiff

Defendant may be served at
Loxley, Alabama

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2132

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Mrs. Pat Brock

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

Mrs. Pat Brock, Defendant

by Ethel A. Bradley

, Plaintiff

Witness my hand this 7th day of July 1953

Eric J. [illegible], Clerk

No. 2032 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Ethel R. Bradley

Plaintiffs

vs.

Mrs. Pat Brock

Defendants

SUMMONS and COMPLAINT

Filed 7-7, 1953

Reichenbach, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

July 7, 1953

Taylor Wilkins, Sheriff

I have executed this summons

this July 10, 1953

by leaving a copy with

Mrs Pat Brock

Taylor Wilkins Sheriff

Pallegh Wilkins Deputy Sheriff