

DEFENDANT

~~AT-LAN~~

NO. 2090

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4.

WILTERS & BRANTLEY

BY:

Attorney for the Defendant

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW
NO. 2000

OLIVIA PIERSON
PLAINTIFF
VS
ALVIN JAMES
DEFENDANT

Complaint and the defendant are above styled cause and demand for the

Complainant's complaint and for grounds therefor says as follows:

1.

The complaint is vague and indefinite.

2.

The complaint fails to state a cause of action.

3.

The statement alleged to have been made, concerning the Plaintiff,

by the Defendant, does not charge immorality nor adultery.

4.

That the language, alleged to have been used by the Defendant,

concerning the Plaintiff, charging immorality and adultery is but a

conclusion of the pleader.

WITNESSES & SIGNED

Robert M. Herty
Attorney for the Defendant

RECORDED

OLIVIA PIERSON
PLAINTIFF
VS
ALINE TAYLOR
DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW
NO. 2096

Comes now the Defendant in the above styled cause and for answer to
the Complaint filed therein says:

1.

She pleads, in short, by consent, the general issue.

WILTERS & BRANTLEY

BY:

Albert M Brantley

No. 2090
RECORDED

OLIVIA PIERSON

PLAINTIFF

VS

ALINE TAYLOR

DEFENDANT

ANSWER

FILED
OCT 24 1953
ALICE J. BUCK, CLERK

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ALINE TAYLOR 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 OLIVIA PIERSON.

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

Olivia Pierson
Clerk,

OLIVIA PIERSON

Plaintiff

Vs

ALINE TAYLOR

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The Plaintiff claims of the Defendant FIFTY THOUSAND DOLLARS (\$50,000), damages for falsely and maliciously charging the Plaintiff with unchastity, drunkenness and adultery by speaking of and concerning her in the presence of diver's persons in substance as follows; "She (Plaintiff) has been living with Joe Rider in tourist camps and other places." "She (Plaintiff) has left with that good for nothing Joe Rider." "She (Plaintiff) has been drunk for three days and nights." "Joe Rider has a wife and four children and she (Plaintiff) has been living in tourist camps and other places with him." on to-wit the 25th day of April, 1953.

Robert F. H. Smith
Attorney for the Plaintiff

Plaintiff demands a trial by jury.

Robert F. H. Smith
Attorney for the Plaintiff

9-21-53

NO 2090

Executed Sept, 21. 1953
By Sending copy on
Aline Taylor

OLIVIA PIERSON
Plaintiff

RECORDED

Vs

ALINE TAYLOR

Defendant

At the Jury find
Verdict in favor
of Defendant

S. J. Peterson
Foreman

Summons and Complaint

Sheriff
Taylor Wilkins
By
Edleigh Steadham

203

FILED
SEP 19 1953
JAMES H. BUCK, Clerk