

2121

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - IN LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Calvin Ethridge to appear within thirty (30) 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 Imogene Knowles.

Witness my hand, this the 28th day of October, 1953

Archie H. Hensley
CLERK

IMOGENE KNOWLES

Plaintiff

vs.

CALVIN ETHRIDGE

Defendant

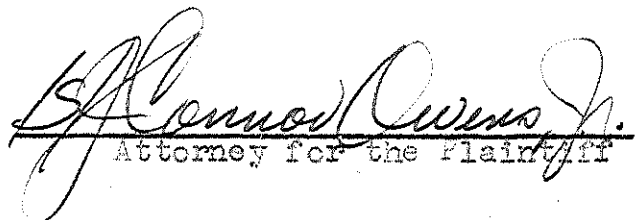
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

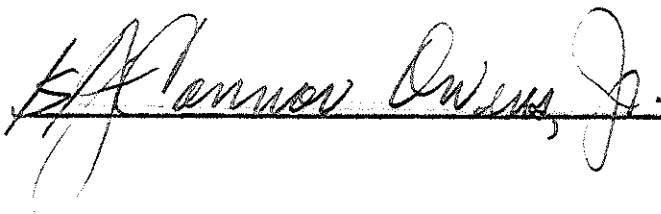
IN LAW NO. _____

Plaintiff claims of the defendant, Calvin Ethridge, the sum of ONE THOUSAND DOLLARS (\$1.000) as damages for that heretofore to-wit:

That on the night of October 19, 1953, on U. S. Highway 90 in Baldwin County, Alabama, at a point 7,000 feet east of the east end of the Tensaw River Bridge, the plaintiff was riding in an automobile being operated by another person, and the defendant, Calvin Ethridge, at the same time and at the same place so negligently managed, operated, or controlled a 1948 Ford in such a manner that said automobile was caused to collide with the automobile in which the plaintiff was a passenger, and as a proximate consequence of the said collision and the defendant's negligence, plaintiff received severe and painful injuries to her neck and to her back and required hospital treatment therefore, and incurred great pain and suffering.


Attorney for the Plaintiff

Plaintiff demands a trial by Jury
pursuant Code 1940, Title 7, Sec. 260.



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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 2121

IMOGENE KNOWLES

Plaintiff

vs.

CALVIN ETHRIDGE

Defendant

Check with rental office

SUMMONS AND COMPLAINT

FILED 10-28-53

Deice J. French
CLERK

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

NP
*921 N. Madison Av.
Chickasaw, Ala*

ETHEL A. BRADLEY,
Plaintiff,
VS.
MRS. PAT BROCK,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2121

PLEA

Now comes the Plaintiff in the above styled cause and
for plea to Paragraph 2 of the Defendant's answer heretofore filed
in this cause says:

1. Not guilty.

James C. Hillard
James R. Davis
Attorneys for Plaintiff.

RECORDED PLEA

ETHEL A. BRADLEY,

Plaintiff,

VS.

MRS. PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2121

*Filed 3-12-54
Alice J. Wicks
Clerk*

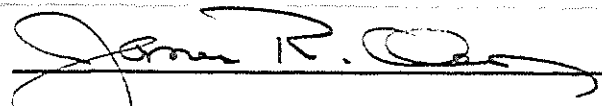
ETHEL A. BRADLEY,
Plaintiff,
VS.
MRS. PAT BROCK,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2121

MOTION TO STRIKE

Now comes the plaintiff in the above styled cause and moves to strike Paragraph 2 of the Answer or plea heretofore filed by the defendant and as grounds for said motion assigns the following:

1. The said Paragraph 2 is no defense to the complaint.
2. The said Paragraph 2 is sounding in damages merely.
3. The said Paragraph 2 is sounding in damages merely and cannot be set-off against the damages claimed by the plaintiff because of Sections 350 and 351 of Title 7 of the 1940 Code of Alabama.


Attorney for plaintiff.

RECORDED

MOTION TO STRIKE

ETHEL A BRADLEY,

Plaintiff,

VS.

MRS. PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2121

FILED
DEC 18 1955
ALICE J. DICK, Clerk

copy given
of Marshall

ETHEL A. BRADLEY,

Plaintiff,

VS.

MRS. PAT BROCK,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 2121.

A N S W E R.

1.

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

2.

For further plea to said Complaint by way of recoupment the defendant claims of the plaintiff the sum of Five Thousand (\$5,000.00) Dollars as damages for an assault and battery committed by the plaintiff on the defendant on, to-wit: the 18th day of March, 1953. And the defendant avers that said plaintiff did on the said date beat, assault and curse and threaten defendant, and as a proximate consequence thereof she was made sick and sore, and suffered bruises about her body. And^s he was caused to suffer great mental and physical pain and anguish all to her damage in the sum aforementioned.

Julian A. Marshall, Jr.
Attorney for Defendant.

I certify that I have this 12th day of November, 1953, handed a copy of the above pleading to James R. Owen, Esq., and that James R. Owen is one of the Attorneys of Record for the plaintiff in this cause.

Julian A. Marshall, Jr.
Attorney for Defendant.

ANSWER AND PLEA.

ETHEL A. BRADLEY

RECORDED

Plaintiff,

Vs.

MRS, PAT BROCK,

Defendant.

In the Circuit Court of
Baldwin County, Alabama.

At Law.

No. 2121.

FILED

NOV 12 1953

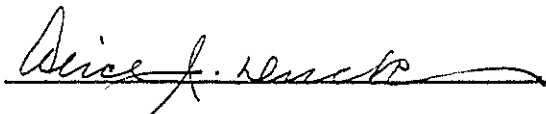
J. DUCK, Clerk

STATE OF ALABAMA)
*
BALDWIN COUNTY)

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 29th day of October, 1953.


Clerk

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

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.

George C. Hillman

James R. Dean

Attorneys for Plaintiff

Plaintiff demands trial of said cause by Jury.

George C. Hillman

James R. Dean

Attorneys for Plaintiff

no 2121
RECORDED

SUMMONS AND COMPLAINT

ETHEL A. BRADLEY,

Plaintiff,

VS.

MRS. PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2121

FILED
OCT 29 1953
ALICE J. DUCK, Clerk

JAMES R. OWEN

ATTORNEY-AT-LAW

BAY MINETTE, ALABAMA

Received in Sheriff's Office
this 29 day of Oct 1953
TAYLOR WILKINS, Sheriff

Received _____ day of _____ 19____

and on 2 day of November 1953

I served a copy of the within _____

on _____

By service on Mrs Pat Brock

TAYLOR WILKINS, Sheriff

By Elleigh S. Hall

James R. Owen
Attorney at Law
Bay Minette, Ala

49863 ROBERTS & SON, BIRMINGHAM

Delaware

11/21