

W. S. BEESLEY	:	STATE OF ALABAMA
Plaintiff	:	
	:	
Vs.	:	IN THE CIRCUIT COURT AT LAW
	:	
LEVI ROGERS,	:	BALDWIN COUNTY, ALABAMA
Defendant	:	
	:	
	:	

DEMURRER

Now comes the defendant in the above styled cause and demurs to the Plaintiff's complaint and each count thereof separately and severally and states the following grounds of demurer to said complaint.

1. That said Complaint does not state a cause of action against the Defendant.
2. For aught that appears Defendant owed no duty to the Plaintiff.
3. For aught that appears the averments of negligence of the Defendant are mere conclusions of the pleader.
4. For aught that appears the Defendant is unable to determine from said Complaint what he is called upon to answer.

L. H. Walden
L. H. WALDEN
ATTORNEY FOR DEFENDANT

2133

RECORDED

WILLIAMS
DEC 2 1954
MR. & MRS. CHART

Mr. & Mrs. Williams
1234 Main Street
New York, N.Y.

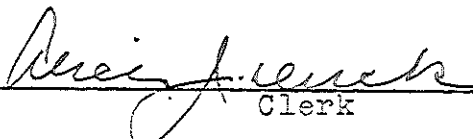
STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:


You are hereby commanded to summon Levi Rogers 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 same, then and there to answer the complaint of W. S. Beesley.

Witness my hand this 18th day of November, 1953.


Clerk

W. S. BEESLEY,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
LEVI ROGERS,	I	AT LAW.
Defendant.	I	

The Plaintiff claims of the Defendant the sum of Two Hundred Fifty Dollars (\$250.00) as damages for that heretofore on, to-wit; September 17, 1953, on a public highway in Baldwin County, Alabama, at a point about five miles West of Bay Minette on a highway leading from Bay Minette to Cross Roads, the Defendant negligently ran an automobile truck, which he was then and there driving, into, over or against a dog owned by the Plaintiff thereby killing such dog, and the Plaintiff avers that the negligence of the Defendant was the proximate cause of his injury and damage, hence this suit.


Attorney for the Plaintiff.

Received in Sheriff's Office
this 16 day of Nov 1953
TAYLOR WILKINS, Sheriff

RECORDED
No 2133

SUMMONS AND COMPLAINT

W. S. BEESLEY,
Plaintiff,
vs.

LEVI ROGERS,
490. Crossed
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

Filed this 18th day of November,
1953.

Alice J. French
Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

Received _____ day of _____ 19____
and on 18 day of Nov 1953
I served a copy of the within _____
on _____

By service on _____

Levi Rogers

TAYLOR WILKINS, Sheriff

By *Paula Deller* D.S.

L. H. WALDEN
ATTORNEY AND COUNSELLOR AT LAW
12½ COMMERCE STREET
MONTGOMERY, ALABAMA

November 25, 1953

Clerk
Circuit Court
Baldwin County, Alabama

Re: W. S. Beesley Vs. Levi Rogers
Claim No: 1859

Dear Sir:

Please find enclosed Demurrer in the above styled cause which we would appreciate your filing for us.

Yours truly,
L. H. Walden
L. H. Walden

LHW/ow
Encl.

