EMMETT F. HILDRETH, JR.

ATTORNEY AT LAW

504 E. NASHVILLE AVE, ATMORE. ALABAMA 36502

June 15, 1970

PHONE 368-3199 P. D. BOX 757

Mrs. Alice J. Duck Clerk of Circuit Court Baldwin County Bayminnette, Alabama

Dear Mrs. Duck:

I am enclosing herein Answer in the case of W. E. Martin vs. Leslie F. Emmons for filing in your office)

Singerelly

Emmett F. Hildreth, Jr.

jw/EFH:JR

Enclosure

W. E. MARTIN,

PLAINTIFF,

VS.

LESLIE F. EMMONS,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO:_____.

ANSWER

Comes the Defendant, LESLIE F. EMMONS, and ANSWERS the Complaint filed in the above styled cause and to each and every count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. Not Guilty.

ATTORNEY FOR DEFENDANT

Defendant demands trial by Jury of the issues involved in this cause.

ATTORNEY FOR DEFEN

JUN 1 7 1970

ALUE J. DUDE: SERVER

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EMMETT F. HILDRETH, JR.

504 E. NASHVILLE AVE. ATMORE. ALABAMA 36502

December 8, 1969

PHONE 368-3199 P, D. BOX 757

Alice J. Duck Clerk of Circuit Court Baldwin County BayMinnette, Alabama

Dear Mrs. Duck:

I am enclosing herein the original and copy of Dumurrer in case of W. E. Martin vs. Lesslie F. Emmons for filing in your office.

Emmett F. Hildreth, Jr.

jw/EFH: JR

Enclosure

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Maria Carrier Services

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Leslie F. Emmons 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. E.

Witness my hand, this the 24 day of 700% 1969.

IN THE CIRCUIT COURT OF

W. E. MARTIN BALDWIN COUNTY, ALABAMA PLAINTIFF AT LAW VS NUMBER: <u>900</u>9 LESLIE F. EMMONS DEFENDANT

Plaintiff claims of the Defendant the sum of ONE-THOUSAND TWO-HUNDRED and NO/100 (\$1,200.00) DOLLARS for that on to-wit the 8th day of November, 1969 Defendant so negligently operated an automobile as to allow or cause the same to run into, over or against Plaintiff's automobile at the intersection of U.S. Highway 31 North and Blackburn Avenue in Bay Minette, Alabama, that as a proximate result of the negligence of Defendant, Plaintiff's automobile was bent, broken, damaged and destroyed, hence this suit.

Defendant may be served:

Church Street Flomaton, Alabama

NOV 241969

ALGS J. BOOK CLERK REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Leslie F. Emmons 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. E. Martin.

Witness my hand, this the 24 day of 7005.

W. E. MARTIN

PLAINTIFF

BALDWIN COUNTY, ALABAMA

VS

AT LAW

LESLIE F. EMMONS

DEFENDANT

DEFENDANT

CLERK

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

NUMBER: 9009

Plaintiff claims of the Defendant the sum of ONE-THOUSAND TWO-HUNDRED and NO/100 (\$1,200.00) DOLLARS for that on to-wit the 8th day of November, 1969 Defendant so negligently operated an automobile as to allow or cause the same to run into, over or against Plaintiff's automobile at the intersection of U.S. Highway 31 North and Blackburn Avenue in Bay Minette, Alabama, that as a proximate result of the negligence of Defendant, Plaintiff's automobile was bent, broken, damaged and destroyed, hence this suit.

torney for Plaintiff

Defendant may be served:

Church Street Flomaton, Alabama

NOV 24 1969

ALICE J. BOOK CLERK REGISTER

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W. E. Martin Pltj. Jeslie, H. Emmons Degt.

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PLAINTIFF.

vs.

LESLIE F. EMMONS,

DEFENDANT.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9009

DEMURRER

Comes the Defendant, LESLIE F. EMMONS, and demurs to the Complaint filed in the above styled cause and to each and every count thereof, separately and severally, and assigns the following separate and several grounds, viz:

- 1. That said Complaint fails to state a cause of action.
 - 2. That said Complaint is vague and indefinite.
- 3. That said Complaint states no fact upon which relief may be granted.

ATTORNEY FOR DETENDANT

ATTORNEY FOR DEFENDANT

Defendant demands trial by Jury of the issues involved in this cause.

DEC 10 1969

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