

LAW OFFICES
OF
W. BORDEN STRICKLAND
THOMAS A. DEAS
201 N. CONCEPTION STREET
MOBILE, ALABAMA 36602
438.4788

January 2, 1970

Mrs. Alice Duck
Register, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Elsie L. Coach
vs
Peggy M. Glass
Circuit Court
Case No. 9032

Dear Mrs. Duck:

Please file the enclosed amendment. A copy
of same has been mailed to Mssrs. Chason, Stone and
Chason.

With best personal regards, I remain

Very truly yours,


W. Borden Strickland

WBS:dl

Enc. as stated

LAW OFFICES
OF
W. BORDEN STRICKLAND
THOMAS A. DEAS
201 N. CONCEPTION STREET
MOBILE, ALABAMA 36602
438.4788

December 5, 1969

Mrs. Alice J. Duck
Clerk, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

9032

Re: Elsie L. Coach
vs
Peggy M. Glass

Charles M. Coach
vs
Peggy M. Glass

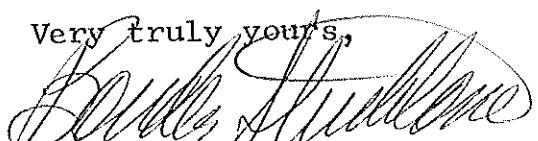
9033

Dear Mrs. Duck:

Please find attached hereto complaints to be filed in the respective causes. Since these suits are companion cases, please file Elsie L. Coach's suit first.

Thanking you for your attention in regard to the above matter, I remain

Very truly yours,


W. Borden Strickland

WBS:dl

Enc. as stated

ELSIE L. COACH,	X		
Plaintiff,	X	IN THE CIRCUIT COURT OF	
vs.	X	BALDWIN COUNTY, ALABAMA	
PEGGY M. GLASS,	X		
Defendant.	X	LAW SIDE	NO. 9032

Comes now the Defendant and demurs to the amended 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 does not state a cause of action.
2. That said complaint does not allege any duty owing by the Defendant to the Plaintiff.
3. That said complaint seeks to set out the negligence of the Defendant in detail but the allegations of such complaint are not sufficient to constitute negligence as a matter of law.
4. That Count One of said complaint alleges that the Plaintiff was riding as a passenger in the automobile being driven by the Defendant and was not in the status of a guest but as an invitee of the Defendant, which allegations are simply conclusions of the pleader and fail to allege any facts which show, as a matter of law, that the Plaintiff was not a guest at the time of the accident.
5. That Count One of the amended complaint fails to allege in what way the Defendant was benefitted by the presence of the Plaintiff in the automobile that the Defendant was driving.
6. The allegation in Count One of the amended complaint that the Plaintiff was in the automobile which was being driven by the Defendant upon the express or implied invitation of the Defendant is but a conclusion of the pleader and does not allege facts to substantiate such statement.

7. That said complaint does not sufficiently set out the place where the accident occurred.

Kasson, Stone & Kasson
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 8 day

of Jan 1970

[Signature]

FILED

JAN 8 1970

ALICE J. BUEK CLERK
REGISTER

ELSIE L. COACH,

Plaintiff,

vs.

PEGGY M. GLASS,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

NO. 9032

* * * * *

DEMURRER

* * * * *

FILED

JAN 8 1970

ALICE J. BERRY CLERK
BUSA REGISTER

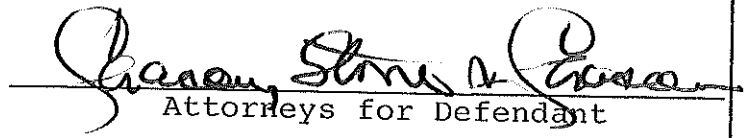
ELSIE L. COACH,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
PEGGY M. GLASS,	X	AT LAW NO: 9032
Defendant.	X	

DEMURRER:

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

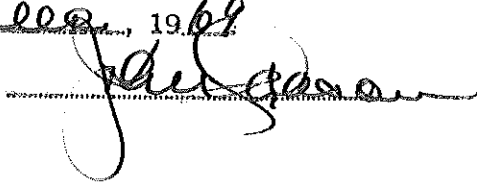
1. That said Complaint does not state a cause of action.
2. That said Complaint does not allege any duty owing by the Defendant to the Plaintiff.
3. That the place where the accident occurred is not sufficiently set out in either Count of the Complaint.
4. That the allegation in each Count of the Complaint as to why the Plaintiff was in the automobile which was being driven by the Defendant is but a conclusion of the pleader and does not state sufficient facts as a matter of law to show that the Plaintiff was not a guest at the time of the accident.
5. That said Count fails to state the mission related to the business of the Defendant which removed the Plaintiff from being a guest in the automobile.
6. That such Count fails to allege in what way the Defendant benefited from transporting the Plaintiff in her automobile.
7. That the Plaintiff has included two separate and distinct claims for damages in Count Two of the Complaint.
8. That there is a misjoinder of causes of action in Count Two of such Complaint.

9. That Count Two of said Complaint is vague and indefinite.


Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 29 day of December, 1968.



ELSIE L. COACH,

Plaintiff,

vs.

PEGGY M. GLASS,

Defendant

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO: 9032

* * * * *

DEMURRER:

FILED

* * * * *

DEC 29 1969

ALICE J. DUCK CLERK
REGISTER

ELSIE L. COACH, * IN THE CIRCUIT COURT FOR
 Plaintiff * THE 28th JUDICIAL CIRCUIT
 VS * OF ALABAMA
 PEGGY M. GLASS, *
 Defendant * CASE NO. 9032

C O M P L A I N T

COUNT ONE

Plaintiff claims of the Defendant the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as damages, for that heretofore on, to-wit, August 9, 1969, the Plaintiff was riding as a passenger in an automobile being operated by the Defendant, and the Plaintiff was present on said occasion in the said automobile being operated by the Defendant, not in the status of a guest within the meaning of the Alabama Guest Statute but as an invitee of the Defendant and upon the express or implied invitation of the Defendant on a mission related to the business of the Defendant, which afforded a substantial benefit to the Defendant in transporting the Plaintiff in said automobile as aforesaid; and Plaintiff further avers that on said occasion the said automobile while proceeding upon a public highway in Baldwin County, Alabama, on, to-wit, U. S. Highway 90 at, to-wit, one-half mile from Loxley, Alabama, collided with another motor vehicle, to-wit, a truck vehicle, which was on said occasion being operated by Wiley P. Brock, and Plaintiff avers that as a proximate consequence of said collision the Plaintiff suffered the following injuries and damages: Her left leg was broken or fractured, resulting in permanent and painful disability; her right elbow was fractured; she received lacerations about her face & head; she received abrasions about her right knee and leg; she was hospitalized

for a period of time, to-wit, eleven (11) days; she was severely bruised and was made sick and sore for a long time; she has in the past suffered physical and mental pain and will so suffer in the future; she was internally injured and permanently injured, all to her damages, for which she claims.

Plaintiff avers that the Defendant, Peggy M. Glass, negligently caused or negligently allowed the automobile of which she was in charge or control as aforesaid to be in collision with the said truck vehicle as aforesaid; and the Plaintiff further avers that as a proximate consequence of said negligence of the Defendant the Plaintiff suffered the injuries and damages hereinabove set forth, hence this suit.

COUNT TWO

Plaintiff claims of the Defendant the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as damages, for that heretofore on, to-wit, August 9, 1969, while Plaintiff was riding in an automobile on a public highway in Baldwin County, Alabama on what is commonly known as U. S. Highway 90, at, to-wit, one-half mile from Loxley, Alabama, which said automobile was being then and there operated by the Defendant, and while Plaintiff was riding in said automobile as a passenger, the Defendant so negligently operated the said automobile which she was driving as to negligently cause or negligently allow said motor vehicle to collide with another motor vehicle, to-wit, a truck vehicle, while was on said occasion being operated by Wiley P. Brock, and Plaintiff avers that as a proximate consequence of said collision the Plaintiff suffered the following injuries and damages: Her left leg was broken or fractured, resulting in permanent and painful disability; her right

elbow was fractured; she received lacerations about her face & head; she received abrasions about her right knee and leg; she was hospitalized for a period of time, to-wit, eleven (11) days; she was severely bruised and was made sick and sore for a long time; she has in the past suffered physical and mental pain and will so suffer in the future; she was internally injured and permanently injured, all to her damages, for which she claims.

Plaintiff claims of the Defendant, the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as punitive damages, for that heretofore and on, to-wit, August 9, 1969, while Plaintiff was riding in an automobile on a public highway in Baldwin County, Alabama on what is commonly known as U. S. Highway 90, at or near Loxley, Alabama, which said automobile was being then and there operated by the Defendant, and while Plaintiff was riding in said automobile at the invitation of the Defendant, said Defendant wantonly injured Plaintiff by wantonly operating said motor vehicle on the said public highway in Baldwin County, Alabama commonly known as U. S. Highway 90, at or near Loxley, Alabama so as to wantonly cause or allow the said automobile to collide with another motor vehicle, to-wit, a truck vehicle, which was on said occasion being operated by Wiley P. Brock, and Plaintiff avers that as a proximate consequence of said collision the Plaintiff suffered the following injuries and damages: Her left leg was broken or fractured, resulting in permanent and painful disability; her right elbow was fractured; she received lacerations about her face & head; she received abrasions about her right knee and leg; she was hospitalized for a period of time, to-wit, eleven (11) days; she was severely bruised and was made sick and sore for a

long time; she has in the past suffered physical and mental pain and will so suffer in the future; she was internally injured and permanently injured, all to her damages, for which she claims.

Plaintiff avers that her injuries and damages were proximately caused by the wanton conduct of the Defendant in that said Defendant wantonly injured Plaintiff by wantonly causing said automobile so controlled or operated by her at the time and place aforesaid to collide with the truck vehicle being operated by Wiley P. Brock at the time and place aforesaid, hence this suit.



W. BORDEN STRICKLAND,
Attorney for Plaintiff
201 N. Conception Street
Mobile, Alabama

Plaintiff demands a trial by jury.



W. BORDEN STRICKLAND
Attorney for Plaintiff

Defendant may be served at:

Peggy M. Glass
Loxley, Alabama

FILED

DEC 8 1969

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9032

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon PEGGY M. GLASS

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 PEGGY M. GLASS

~~ELSTIE L. COACH~~ Defendant.....

by ELSTIE L. COACH + ~~PEGGY M. GLASS~~

....., Plaintiff.....

Witness my hand this 8th day of December 1969.

Allice J. [Signature] Clerk

24 12-11-69

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ELsie L. COACH

Plaintiffs

vs.

PEGGY M. GLASS

Defendants

SUMMONS AND COMPLAINT

Filed December 8, 1969

.....Alice J. Duck..... Clerk

W. Borden Strickland

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

12/8/69 1969

Taylor Wilkins Sheriff

I have executed this summons

this 12-11 1968

by leaving a copy with

Peggy M. Glass

Sheriff claims
 400
 Ten cents per mile totals 4.00
 TAYLOR WILKINS, Sheriff
 DEPUTY SHERIFF

Taylor Walker, Sheriff

14. LB rows Deputy Sheriff

401 nels R T
Lashy

964-5615

ELSIE L. COACH, * IN THE CIRCUIT COURT OF
 * *
 * BALDWIN COUNTY, ALABAMA
 * *
 VS * AT LAW
 * *
 PEGGY M. GLASS, * *
 * *
 * CASE NO. 9032

AMENDMENT TO COMPLAINT

Comes now the Plaintiff and amends her complaint, heretofore filed, to read as follows:

COUNT ONE

Plaintiff claims of the Defendant the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as damages, for that heretofore on, to-wit, August 9, 1969, the Plaintiff was riding as a passenger in an automobile being operated by the Defendant, and the Plaintiff was present on said occasion in the said automobile being operated by the Defendant, not in the status of a guest within the meaning of the Alabama Guest Statute but as an invitee of the Defendant and upon the express or implied invitation of the Defendant on a mission related to the business of the Defendant, which afforded a substantial benefit to the Defendant in transporting the Plaintiff in said automobile as aforesaid; and Plaintiff further avers that on said occasion the said automobile while proceeding upon a public highway in Baldwin County, Alabama, on, to-wit, U. S. Highway 90 at, to-wit, one-half mile from Loxley, Alabama, collided with another motor vehicle, to-wit, a truck vehicle, which was on said occasion being operated by Wiley P. Brock, and Plaintiff avers that as a proximate consequence of said collision the Plaintiff suffered the following injuries and damages: Her left leg was broken or fractured, resulting in permanent and painful disability; her right elbow was fractured; she

received lacerations about her face & head; she received abrasions about her right knee and leg; she was hospitalized for a period of time, to-wit, eleven (11) days; she was severely bruised and was made sick and sore for a long time; she has in the past suffered physical and mental pain and will so suffer in the future; she was internally injured and permanently injured, all to her damages; for which she claims.

Plaintiff avers that the Defendant, Peggy M. Glass, negligently caused or negligently allowed the automobile of which she was in charge or control as aforesaid to be in collision with the said truck vehicle as aforesaid; and the Plaintiff further avers that as a proximate consequence of said negligence of the Defendant the Plaintiff suffered the injuries and damages hereinabove set forth, hence this suit.

COUNT TWO

Plaintiff claims of the Defendant the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as damages, for that heretofore on, to-wit, August 9, 1969, while Plaintiff was riding in an automobile on a public highway in Baldwin County, Alabama on what is commonly known as U. S. Highway 90, at, to-wit, one-half mile from Loxley, Alabama, which said automobile was being then and there operated by the Defendant, and while Plaintiff was riding in said automobile as a passenger, the Defendant so negligently operated the said automobile which she was driving as to negligently cause or negligently allow said motor vehicle to collide with another motor vehicle, to-wit, a truck vehicle, while was on said occasion being operated by Wiley P. Brock, and Plaintiff avers that as a proximate consequence of said collision the Plaintiff suffered the


following injuries and damages: Her left leg was broken or fractured, resulting in permanent and painful disability; her right elbow was fractured; she received lacerations about her face & head; she received abrasions about her right knee and leg; she was hospitalized for a period of time, to-wit, eleven (11) days; she was severely bruised and was made sick and sore for a long time; she has in the past suffered physical and mental pain and will so suffer in the future; she was internally injured and permanently injured, all to her damages, for which she claims.

COUNT THREE

Plaintiff claims of the Defendant, the sum of FIFTY THOUSAND AND NO/100 (\$50,000.00) DOLLARS, as punitive damages, for that heretofore and on, to-wit, August 9, 1969, while Plaintiff was riding in an automobile on a public highway in Baldwin County, Alabama on what is commonly known as U. S. Highway 90, at or near Loxley, Alabama, which said automobile was being then and there operated by the Defendant, and while Plaintiff was riding in said automobile at the invitation of the Defendant, said Defendant wantonly injured Plaintiff by wantonly operating said motor vehicle on the said public highway in Baldwin County, Alabama commonly known as U. S. Highway 90, at or near Loxley, Alabama so as to wantonly cause or allow the said automobile to collide with another motor vehicle, to-wit, a truck vehicle, which was on said occasion being operated by Wiley P. Brock, and Plaintiff avers that as a proximate consequence of said collision the Plaintiff suffered the following injuries and damages; Her left leg was broken or fractured, resulting in permanent and painful disability; her right elbow was fractured; she

received lacerations about her face & head; she received abrasions about her right knee and leg; she was hospitalized for a period of time, to-wit, eleven (11) days; she was severely bruised and was made sick and sore for a long time; she has in the past suffered physical and mental pain and will so suffer in the future; she was internally injured and permanently injured, all to her damages, for which she claims.

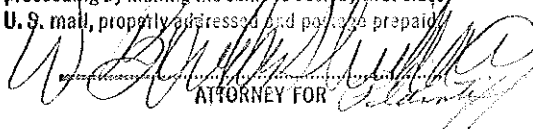
Plaintiff avers that her injuries and damages were proximately caused by the wanton conduct of the Defendant in that said Defendant wantonly injured Plaintiff by wantonly causing said automobile so controlled or operated by her at the time and place aforesaid to collide with the truck vehicle being operated by Wiley P. Brock at the time and place aforesaid, hence this suit.


W. BORDEN STRICKLAND,
Attorney for Plaintiff
201 N. Conception Street
Mobile, Alabama

Plaintiff demands a trial by jury.


W. BORDEN STRICKLAND,
Attorney for Plaintiff

CERTIFICATE OF SERVICE
I certify that on this 2nd day of January,
1970, a copy of the foregoing pleading has been
served upon counsel for all adverse parties to this
proceeding by mailing the same to each by first class
U. S. mail, properly addressed and postage prepaid.


ATTORNEY FOR

FILED

JAN 3 1970

ALICE J. BROWN

[illegible]

• Quali gli effetti di un aumento della spesa pubblica?

1. *Phragmites australis* (Cav.) Trin. ex Steud. (Common reed)
 2. *Phragmites australis* (Cav.) Trin. ex Steud. (Common reed)
 3. *Phragmites australis* (Cav.) Trin. ex Steud. (Common reed)
 4. *Phragmites australis* (Cav.) Trin. ex Steud. (Common reed)
 5. *Phragmites australis* (Cav.) Trin. ex Steud. (Common reed)
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 9. *Phragmites australis* (Cav.) Trin. ex Steud. (Common reed)
 10. *Phragmites australis* (Cav.) Trin. ex Steud. (Common reed)

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