

VERA MAE MALONE, EXECUTRIX OF  
THE ESTATE OF LEILA MCKINLEY LYNN,  
DECEASED

Plaintiff

VS.

ARVIL G. HINSHAW

Defendant

IN THE CIRCUIT COURT OF

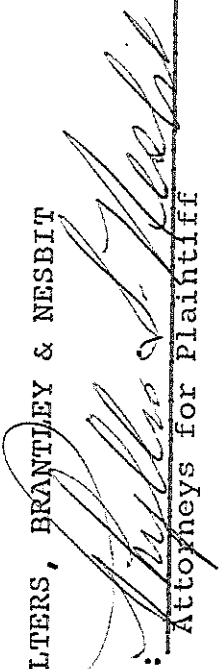
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9023

The Plaintiff, Vera Mae Malone, Executrix of the Estate of Leila McKinley Lynn, deceased, claims of the Defendant the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages, for that on, heretofore, to-wit: The 6th day of August, 1969, on Alabama Highway #59, a public highway in Baldwin County, Alabama, at a point approximately 150 feet North of the intersection of said Alabama Highway #59 and Summerdale road, the Defendant, Arvil Hinshaw, so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against Leila McKinley Lynn and as a proximate consequence and result of the negligence of the Defendant, Arvil G. Hinshaw, at said time and place, the said Leila McKinley Lynn suffered severe personal injuries from which she died. Wherefore, the Plaintiff, Vera Mae Malone, Executrix of the Estate of Leila McKinley Lynn, deceased, brings this suit and asks judgment in the above amount.

WILTERS, BRANTLEY & NESBIT

BY:   
Attorneys for Plaintiff

The Plaintiff respectfully demands  
a trial of this cause by a jury.

WILTERS, BRANTLEY & NESBIT

BY:   
Attorneys for Plaintiff

FILED

JAN 7 1970

ALICE J. BROWN  
CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Arvil G. Hinshaw

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.....

Arvil G. Hinshaw Defendant.....

by Vera Mae Malone, Executrix of the Estate of Leila McKinley

Lynn, Deceased Plaintiff.....

Witness my hand this 8 day of Jan 19 70

Alice J. Black Clerk

*Dw Hoyle - July*  
No. 9073 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Vera Mae Malone, Executrix of  
the Estate of Leila McKinley  
Lynn, deceased

Plaintiffs

vs.

Arvil G. Hinshaw

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

*House Before G. SUGEMAN  
265 Dixie Rd.*

WILLIERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

96 332

Defendant lives at

Summedale, Alabama.....

Received In Office

*June 11*  
19..

*Walter C. Perkins* Sheriff

I have executed this summons

this 10-June-20 19.....

by leaving a copy with

*Arvil G. Hinshaw*

..... Sheriff claims 66 miles at  
Ten Cents per mile Total \$ 6.60  
TAYLOR WILKINS, Sheriff  
BY Beard 19 20  
DEPUTY SHERIFF

Returned 23 day of March  
Not found in my county after diligent search and in-  
quiry.

BY

23 day of March 19 20

Not found in my county after diligent search and in-  
quiry.

*Taylor Wilkins, Sheriff*  
*W. Beard, Deputy Sheriff*

..... Sheriff

..... Deputy Sheriff

*66 Miles Rd.  
Dixie Road*

VERA MAE MALONE, EXECUTRIX X  
OF THE ESTATE OF LEILA X  
MCKINLEY LYNN, DECEASED, X  
Plaintiff, X  
vs. X  
ARVIL G. HINSHAW, X  
Defendant. X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW NO. 9073

DEMURRER

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause and assigns the following separate and several grounds:

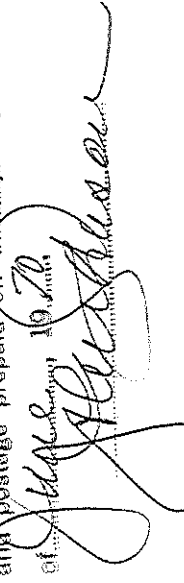
1. That said complaint does not state a cause of action.
2. That said Complaint does not allege the capacity in which the Plaintiff sues.
3. That the place where the accident occurred is not sufficiently set out.
4. That said Complaint does not allege any duty owing by the Defendant to the Plaintiff.

CHASON, STONE & CHASON

By: 

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 19th day

of June, 1970.  


FILED

JUN 19 1970

ALBEE J. DUCK  
CLERK  
REGISTER

9073

Vera Mae Malone  
Admin of  
Estate

vs

Arvil G. Henshaw

X  
X  
X  
X  
X  
X

*[Faint, illegible text, possibly a signature or stamp]*