

WILLIAM M. THOMPSON,

PLAINTIFF,

VS.

RICHARD A. SIBLEY,

DEFENDANT.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA

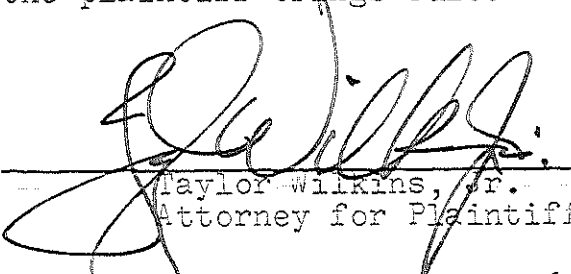
: AT LAW

:

: CASE NO:

COUNT ONE

Plaintiff claims of the defendant the sum of FIVE THOUSAND and NO/100 (\$5,000.00) DOLLARS as damages for that heretofore, on, to-wit, September 10, 1969, Richard A. Sibley, defendant, so negligently operated an automobile on U. S. Highway No. 31, a public road in the County of Baldwin, State of Alabama, at a point, to-wit, approximately 1.5 miles northeast of the intersection of said U. S. Highway No. 31 and U. S. Highway No. 90, a public road in said County and said State, that the said automobile of the defendant then and there collided with the plaintiff's automobile which was then and there being operated by the plaintiff on said U. S. Highway No. 31, and as a proximate result of the negligence of the defendant as aforesaid, plaintiff was made sick, sore and lame, he received contusions and abrasions and suffered severe sprain and strain to the muscles, tendons and ligaments in his neck, and continues to suffer severe pain from said injuries, and he was caused to pay sums of money for doctor bills, medical and drug costs, his automobile was bent, broken, damaged and rendered less valuable, for all of which the plaintiff brings suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

*Plaintiff respectfully demands a trial
by a jury. J. A. Wilkins, Jr.*

FILED

FEB 27 1970

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Richard A. Sibley, 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 same, then and there to answer the complaint of William A. Thompson.

Witness my hand and seal this the 20 day of February, 1970.

Alice J. Duck
CLERK

FILED

FEB 23 1970

Alice J. Duck CLERK
REGISTER

24-9-70
VOL:

64 PAGE 551

85 98

[Signature]

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 91414

WILLIAM M. THOMPSON.

PLAINTIFF,

VS.

RICHARD A. SIBLEY,

DEFENDANT.

1st house left high

TAYLOR WILKINS, JR.
ATTORNEY FOR PLAINTIFF

DEFENDANT MAY BE SERVED:

P. O. BOX 434
SPANISH FORT, ALABAMA

*% Hopkins & Price
C PA*

320 Dodge Ave.

MOORE TO

*MOBILE
to
Smedley*

Received. *3* day of *April* 19*70*
and on *9* day of *April* 19*70*
I served a copy of the within *Moore*
on *Richard A. Sibley*

Moore to Mobile
Returned *26* day of *April* 19*70*
Not found in my county after diligent search and the
quity.

By W. Brooks, Jr.
Taylor Wilkins, Sheriff
Deputy Sheriff

By H. B. B. B. B.
Taylor Wilkins, Sheriff
Deputy Sheriff

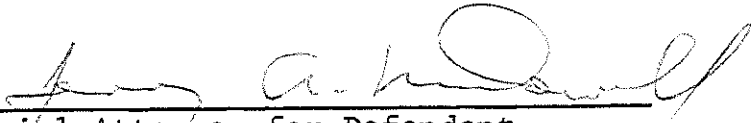
*HAC ALA.
SUBJECTS FOR MOBILE
MOORE TO MOBILE
CHETTER*

WILLIAM M. THOMPSON, : IN THE CIRCUIT COURT OF
Plaintiff : BALDWIN COUNTY,
v. : ALABAMA
RICHARD A. SIBLEY, : AT LAW
Defendant. : CASE NO. 9144

A N S W E R

Comes now the defendant and for answer to the plaintiff's complaint, and each count thereof, separately and severally, sets down and assigns the following separate and several pleas:

1. Not guilty.



Trial Attorney for Defendant
3000 First National Bank Building
Mobile, Alabama 36602

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing Answer to Taylor D. Wilkins, Jr., Esq., Attorney for Plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Bay Minette, Alabama, on this, the 16th day of April, 1970.



FILED

APR 17 1970

9144

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
THOMAS GUY GREAVES, III

April 16, 1970

Honorable Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507


Re: William M. Thompson v. Richard A. Sibley
Case Number 9144

Dear Mrs. Duck:

I enclose herewith an answer that we would appreciate your filing on behalf of the defendant in this case. Would you please note the time that this answer is filed on the copy of the answer and return the same for my information so that I will have the date that the answer is docketed in your office.

Your consideration is appreciated.

Yours very truly,


For the Firm

JAMcD.cac
Enc.

