

THOMAS D. TAYLOR,
PLAINTIFF,

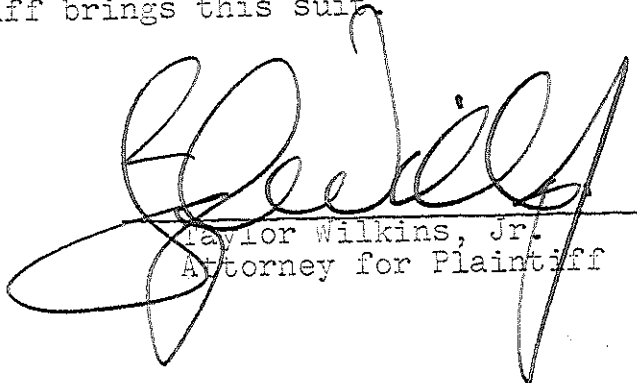
VS.

JOHN REES, JR.
DEFENDANT.

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW
X
X CASE NO: 9163

COUNT ONE

Plaintiff claims of the defendant the sum of FIVE HUNDRED AND NO/100 (\$500.00) DOLLARS as damages, for that heretofore, and on, to-wit, July 26, 1969, John Rees, Jr., defendant, so negligently operated an automobile on U. S. Highway No. 90, a public road in the County of Baldwin, State of Alabama, at a point approximately, to-wit, six (6) miles east of the eastern city limits of Mobile, Alabama, that the said automobile then and there collided with the plaintiff who was then and there operating his automobile on said U. S. Highway No. 90, and as a proximate result of the negligence of the defendant as aforesaid, the plaintiff's automobile was bent, broken, smashed and rendered less valuable, his automobile was knocked out of line, for all of which the plaintiff brings this suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

MAR 10 1970

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

THE 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 JOHN REES, JR.

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.....

JOHN REES, JR. ... Defendant.....

by THOMAS D. TAYLOR

..... Plaintiff.....

Witness my hand this 10 day of March 1970
Alice Luck, Clerk

No. 9163

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

THOMAS D. TAYLOR

Plaintiffs

vs.

JOHN REES, JR.

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

MAR 10 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

TAYLOR WILKINS, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
911 D'Olive Street or
101 Margo Street
Bay Minette, Alabama

Recieved In Office

March 10 1970

Sheriff

I have executed this summons

this April 27 1970
by leaving a copy with

John Rees

Taylor Wilkins Sheriff

W. O. Elliott Deputy Sheriff

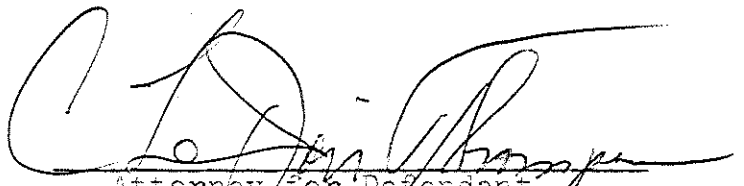
Moore Printing Co. - Bay Minette, Ala.

THOMAS D. TAYLOR,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
-vs-	)	AT LAW
JOHN REES, JR.,	)	CASE NO. 9163
Defendant.	)	

D E M U R R E R :

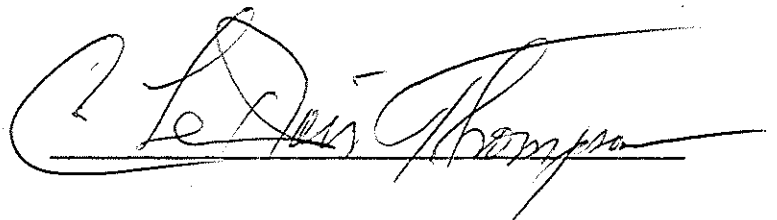
Comes the defendant in the above styled cause and for demurrer to the complaint filed in said cause shows as follows:

- (1) Said complaint fails to state a cause of action.
- (2) That said plaintiff fails to allege that he had a right to be at the point and place where the accident occurred.
- (3) Said plaintiff fails to allege whether his automobile was damaged on the front, side or rear.


Attorney for Defendant.

I hereby certify that I have this day served a copy of the above DEMURRER on the Honorable Taylor Wilkins, Jr., by depositing a copy of same in the United States mail, postage prepaid and properly addressed to his Bay Minette address.

This the 26 day of May, 1970.



FILED

MAY 27 1970

ALICE J. DUCK CLERK
REGISTER

9163

FILED

MAY 27 1970

ALICE J. DUCK CLERK
REGISTER