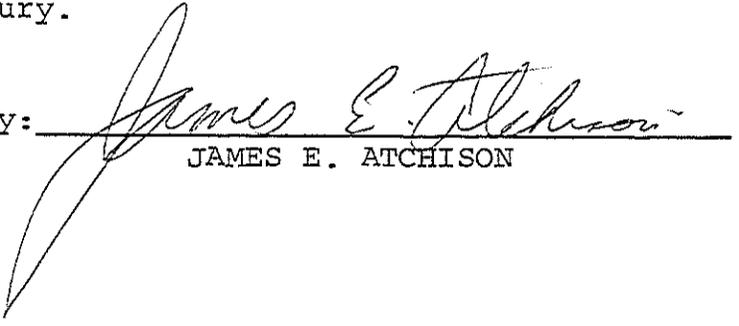




Plaintiff demands trial by jury.

by:



A handwritten signature in cursive script, appearing to read "James E. Atchison", is written over a horizontal line. The signature is written in dark ink and is somewhat stylized.

JAMES E. ATCHISON

Defendant may be served:  
David Stanley Dunn  
P. O. Box 15  
Silver Hill, Alabama

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

} No. 9182

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ..... David Stanley Dunn .....

.....  
.....  
.....

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.....

..... David Stanley Dunn ..... Defendant.....

by ..... Mary Ella Caples .....

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

Witness my hand this..... 25 ..... day of ..... March ..... 19..... 70

..... *Berice J. Duck* ..... Clerk

*24 4-10-70*

No. 9182

Page.....

**THE STATE OF ALABAMA  
BALDWIN COUNTY**

**CIRCUIT COURT**

MARY ELLA CAPLES

Plaintiffs

vs.

DAVID STANLEY DUNN

Defendants

Box 15 - Still

**SUMMONS AND COMPLAINT**

Filed 3-25 19 70

Alice J. Duck Clerk

James E. Atchison  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 25 19 70

Taylor Wilkins Sheriff

I have executed this summons

this 4-10-19 70

by leaving a copy with

David S. Dunn

Sheriff claims 60 miles at  
Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff  
BY *[Signature]*  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

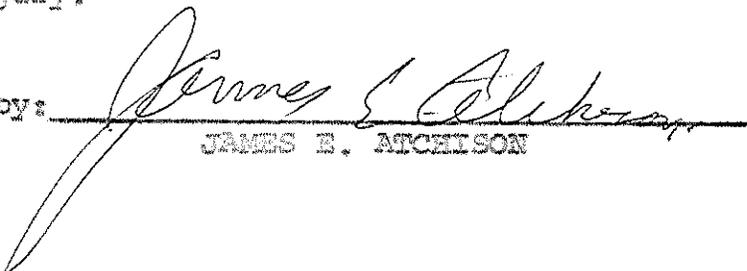
H. J. Brown  
~~Deputy Sheriff~~ Deputy Sheriff

60 miles R-T.  
A - Hill



Plaintiff demands trial by jury.

by:

  
JAMES E. MICHISON

Defendant may be served:  
David Stanley Dunn  
P. O. Box 15  
Silver Hill, Alabama

SEALE, MARSAL, SEALE & DUKE

LAWYERS

2410 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

HARRY SEALE

M. A. MARSAL

A. J. SEALE

LEON G. DUKE

JAMES E. ATCHISON

MAILING ADDRESS  
POST OFFICE BOX 1746  
432-6686

August 10, 1970

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

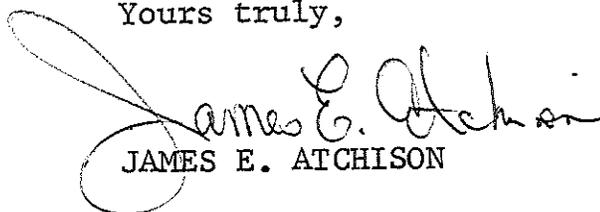
Re: Mary Ella Caples v. David & Thomas  
Dunn-Case No. 9182

Dear Mrs. Duck:

The above case has been settled and should be dismissed from the trial docket. Please forward your cost bill to Mr. James Johnson of State Farm Insurance Company, P. O. Box 9068, Mobile, Alabama, 36609.

Thanking you, I am

Yours truly,

  
JAMES E. ATCHISON

*Done  
8-12-70*

JEA:mjm

CC: Mr. James Johnson  
Honorable John E. Chason

MARY ELLA CAPLES,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
DAVID STANLEY DUNN,	X	
		AT LAW NO. 9182
Defendant.	X	

DEMURRER

Comes now the Defendant in the above styled cause, by and through his Attorneys of Record and demurs to the complaint heretofore filed against him and shows unto the Court in support thereof the following separate and several grounds:

1. Said complaint is vague, indefinite and uncertain.
2. Said complaint fails to allege the time of day or night at which said accident allegedly occurred.
3. Said complaint fails to sufficiently advise the Defendant of the injuries and damages sustained by the Plaintiff.
4. Said complaint fails to allege how much time was lost from her employment.
5. Said complaint fails to allege that the Plaintiff was gainfully employed at the time of the accident.
6. Said complaint fails to allege in what particulars the Plaintiff's automobile was damaged.

CHASON, STONE & CHASON

By: John E. Chason  
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 21 day

of April 1970.

John E. Chason

**FILED**

APR 21 1970

ALICE J. [unclear]