

WILLIS STOKLEY,

Plaintiff,

vs.

CHRISTINE MAY HEINIG,

Defendant.

* IN THE CIRCUIT COURT OF

* BALDWIN COUNTY

* ALABAMA

* AT LAW

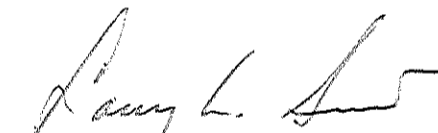
* CASE NO. 9315

A N S W E R

Comes now the defendant and for answer to the plaintiff's complaint herein, sets down and assigns the following separate and several pleas:

1. Not guilty.

2. Plaintiff ought not recover for that at the time and place complained of, plaintiff's agent, servant or employee, while acting within the line and scope of his employment, so negligently operated plaintiff's automobile as to cause it to collide with the defendant's automobile and did thereby proximately contribute to the accident and damages complained of.



LARRY U. SIMS
Attorney for Defendant

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 John E. Chason, Attorney for the plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to Mr. Chason at his office in Bay Minette, Alabama on this, the 30th day of July, 1970.

FILED

JUL 31 1970

ALICE J. DUCK

CLERK
REGISTER

VOL

67 PAGE 83

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
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J. THOMAS HINES, JR.
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LOUIS E. BRASWELL
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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

August 18, 1970

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

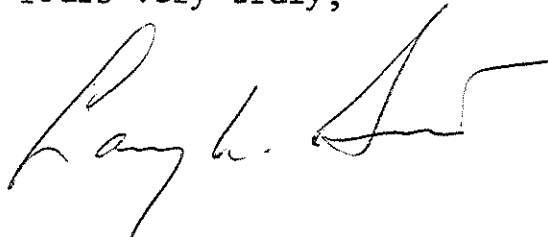
Re: Willis Stokley
vs.
Christine May Heinig
Case No. 9315

Dear Mrs. Duck:

Enclosed please find an amended answer to be filed in the above-referenced matter. I would appreciate your taking care of this matter per your usual handling.

Also please let me know if this case has been set for trial or when it will likely be set for trial as a non-jury case.

Yours very truly,



For the Firm

LUS:rt

Encl: amended answer.

#9315
C. B. 40-

432-5511

MICHAEL D. KNIGHT

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Christine May Heinig to appear within thirty 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 Willis Stokley.

Witness my hand this 5 day of June, 1970.

Alice J. Darr
Clerk

WILLIS STOKLEY,

X

IN THE CIRCUIT COURT OF

Plaintiff,

X

vs.

X

BALDWIN COUNTY, ALABAMA

CHRISTINE MAY HEINIG,

X

AT LAW

Defendant.

X

9315

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Twelve Hundred Dollars (\$1200.00) as damages for that heretofore on, to-wit, the 19th day of September, 1969, at a point on U. S. Highway Number 98 1.3 miles West of the limits of the City of Foley in Baldwin County, Alabama, which point is on a public highway, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff, and as a proximate result of such negligence the vehicle of the Plaintiff was damaged in that its rear bumper and left rear fender, the deck lid, the rear lights, the upper and lower body panel and the roof panel were all bent, damaged or

broken, the engine mounts and the right rocker panel were bent, damaged or broken, the frame was bent and mis-aligned and the entire car required refinishing; the value of the automobile was permanently depreciated and the Plaintiff was deprived of the use of the automobile, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

FILED

JUN 5 1970

ALICE J. DUCK CLERK
REGISTER

24
6-24-70

WILLIS STOKLEY,	§	IN THE CIRCUIT COURT OF
Plaintiff,	§	BALDWIN COUNTY,
vs.	§	ALABAMA
CHRISTINE MAY HEINIG,	§	AT LAW
Defendant.	§	CASE NO. 9315


AMENDED ANSWER

Comes now the defendant in the above-styled cause and amends her answer previously filed herein so that it now reads as follows and sets down and assigns the following separate and several pleas:

1. Not guilty.

2. Plaintiff ought not recover for that at the time and place complained of, plaintiff's agent, servant or employee, while acting within the line and scope of his employment, so negligently operated plaintiff's automobile as to cause it to collide with the defendant's automobile and did thereby proximately contribute to the accident and damages complained of.

3. Defendant claims of the plaintiff by way of recoupment \$800.00 as damages for that at the time and place complained of in the plaintiff's complaint, plaintiff's agent, servant or employee, while acting within the line and scope of his employment as such, so negligently operated plaintiff's automobile as to cause it to collide with the automobile of the defendant and as a proximate result of the negligence as aforesaid, the defendant's automobile was badly bent, broken and smashed.

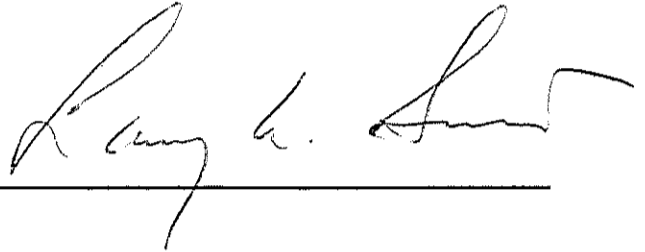

 LARRY U. SIMS, Attorney for Defendant

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 amended answer to John E. Chason, Attorney for the plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to Mr. Chason at his office in Bay Minette, Alabama on this, the 15th day of August, 1970.



FILED

AUG 19 1970

ALICE J. DUCK CLERK
REGISTER

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

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A. CLAY RANKIN, III
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MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
THOMAS GUY GREAVES, III

July 30, 1970

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

Re: Willis Stokley
vs.
Christine May Heinig
Case No. 9315

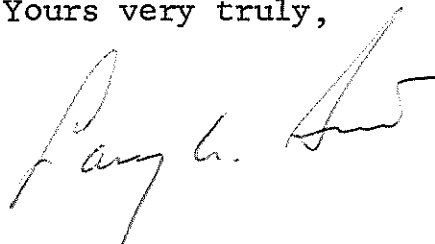
Dear Mrs. Duck:

Enclosed please find an answer to be filed in the
above-referenced case.

Please confirm the filing and that this is a non-
jury case. If this case has been set for trial, please
let me know.

Thank you once again for your help in this matter.

Yours very truly,



For the Firm

LUS.rt

Sheriff claims 90 miles at
Ten Cents per mile Total \$ 9.00
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

Received 5 day of June 1970
and on 27 day of June 1970
I served a copy of the within doc
on Christine May

By service on _____
TAYLOR WILKINS, Sheriff
[Signature] 90

9315

WILLIS STOKLEY,
Plaintiff,
vs.
CHRISTINE MAY HEINIG,
Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

Defendant may be served at
Magnolia Springs, Alabama.

FILED

JUN 5 1970

ALICE J. DUCK CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

#9315
C. B. 40-

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MICHAEL D. KNIGHT

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