

OTIS WASHINGTON,

Plaintiff,

v.

LESLIE VALRIE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

: AT LAW

§

§ CASE NO. 9396

§ § §

The Plaintiff claims of the Defendant TWENTY THOUSAND AND 00/100 (\$20,000.00) DOLLARS damages for an assault and battery committed by the Defendant on the Plaintiff on, to-wit: The 4th day of July, 1970.

And Plaintiff further avers that the Defendant did wrongfully and unlawfully beat and cruelly treat, bruise, wound and injure the Plaintiff.



J. GLENN COBB, JR.
Attorney for Plaintiff,

Defendant may be served:

City Hall
Daphne, Alabama

Plaintiff respectfully demands trial by jury.



J. GLENN COBB, JR.

FILED

JUL 22 1970

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9396

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LESLIE VALRIE

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.....

.....LESLIE VALRIE....., Defendant.....

by Otis Washington

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

Witness my hand this.....22nd.....day of.....July.....19.....70

Alice J. Duck, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

OTIS WASHINGTON

Plaintiffs

vs.

LESLIE VALRIE

Defendants

SUMMONS AND COMPLAINT

Filed July 22, 19 70

Alice J. Duck Clerk

J. Glenn Cobb, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

July 22, 1970

Taylor Wilkins Sheriff

I have executed this summons

this 23 July 1970

by leaving a copy with

Leslie Valrie

Sheriff's Office
 Ten Cents per mile Total \$ 0.20
 TAYLOR WILKINS, Sheriff
 BY [Signature] DEPUTY SHERIFF

Sheriff

[Signature] Deputy Sheriff

OTIS WASHINGTON,

Plaintiff,

v.

LESLIE VALRIE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

: AT LAW

1

CASE NO.

9396

1 1 1

Comes now the Plaintiff, OTIS WASHINGTON, in the above styled cause and amends his Complaint heretofore filed to read in its entirety as follows:

OTIS WASHINGTON,

Plaintiff,

v.

LESLIE VALRIE, JR.,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

: AT LAW

1

CASE NO.

1 1 1

The Plaintiff claims of the Defendant TWENTY THOUSAND AND 00/100 (\$20,000.00) DOLLARS damages for an assault and battery committed by the Defendant on the Plaintiff on, to-wit: The 4th day of July, 1970.

And Plaintiff further avers that the Defendant did wrongfully and unlawfully beat and cruelly treat, bruise, wound and injure the Plaintiff.



J. GLENN COBB, JR.

Plaintiff respectfully demands trial by jury.



J. Glenn Cobb, Jr.

Defendant may be served: City Hall, Daphne, Alabama

FILED

JUL 31 1970

ALICE I. BARRY, CLERK

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 LESLIE VALRIE, 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.....

LESLIE VALRIE, JR.

... Defendant.....

by OTIS WASHINGTON

..... Plaintiff.....

Witness my hand this..... 31st day of July

1970

Alice J. Luck

..... Clerk

No. 9396

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

OTIS WASHINGTON

Plaintiffs

vs.

LESLIE VALRIE

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JUL 31 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
City Hall, ' Daphne, Ala.

Recieved In Office

Aug 3 1970

Taylor Wilkins Sheriff

I have executed this summons

Aug 7 this 1970

by leaving a copy with

Leslie Valrie

Sheriff claims 54 miles at

Ten Cents per mile. Total 5.40

TAYLOR WILKINS, Sheriff

W. C. Cook
DEPUTY SHERIFF

..... Sheriff

W. C. Cook Deputy Sheriff

54 miles

J. GLENN COBB, JR.

ATTORNEY AT LAW

2062 DAUPHIN STREET P. O. Box 6164

MOBILE, ALABAMA 36606

TELEPHONE 479-5436

May 11, 1971

Mrs. Eunice B. Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: Otis Washington v. Melvin Johnson
Case Number 9394 and 9395
Otis Washington v. Leslie Valrie
Case Number 9396

Dear Mrs. Blackmon:

Please remove my name as attorney for the plaintiff, Otis Washington, in the above styled cases.

The plaintiff has been informed of my withdrawal.

Yours,



J. GLENN COBB, JR.

sam

cc: Otis Washington
Norborne C. Stone, Jr., Esquire

Filed
5-13-71

OTIS WASHINGTON,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

X

LESLIE VALRIE,

X

AT LAW

NO. 9396

Defendant.

X

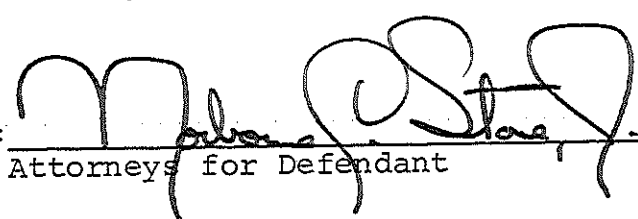
PLEAS

Comes now the Defendant in the above styled cause, by his Attorneys, and for answer to the Complaint heretofore filed against him, pleads as follows:

1. Not guilty.
2. The Defendant alleges that he is a police officer of the Town of Daphne, Alabama, a municipal corporation, and that at the time complained of in the Complaint, the Plaintiff was under arrest by lawful officers of the Town of Daphne, Alabama, and he did at that time, forcibly resist arrest and interfere with the exercise of their authority as police officers of the Town of Daphne, Alabama, and the Defendant used such force as was reasonably necessary to carry out and complete the arrest of the Plaintiff, hence he should not recover.

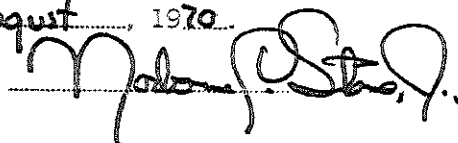
Respectfully submitted,

CHASON, STONE & CHASON

By: 
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 7 day of August, 1970.



FILED

AUG 7 1970

ALICE J. DUCK CLERK
REGISTER