

EULA HENDERSON, X IN THE CIRCUIT COURT
Plaintiff, X BALDWIN COUNTY, ALABAMA
Vs. X AT LAW
WILBURN FLOWERS, X NUMBER: 9406
Defendant. X

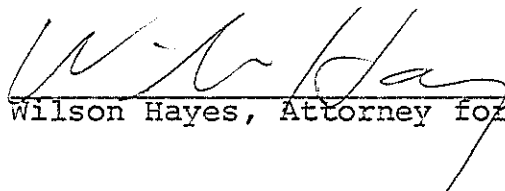
I

Plaintiff claims of Defendant the sum of Five Thousand Dollars (\$5,000.00) for that on to-wit the 1st day of January, 1970 at the intersection of Hurricane Road and US Highway 31 in Bay Minette, Baldwin County, Alabama, Defendant so negligently operated an automobile as to allow it to collide with the automobile in which Plaintiff was then and there riding as a passenger and that as a proximate result of the said negligence of Defendant, Plaintiff was injured in that her head, neck and shoulders were battered and strained causing her to incur doctor's bills and hospital charges and to suffer great pain and anguish, hence this suit.

II

Plaintiff claims of Defendant the sum of Five Thousand Dollars (\$5,000.00) for that Defendant did on to-wit the 1st day of January, 1970 at the intersection of Hurricane Road and US Highway 31 in Bay Minette, Baldwin County, Alabama so negligently operate a motor vehicle as to cause or allow it to collide with the automobile in which Plaintiff was then and there riding as a passenger and that as a proximate result of the said negligence of Defendant, Plaintiff was injured in that her head, neck and shoulders were battered and strained causing her to incur doctor's bills and hospital charges and to suffer great pain and anguish, hence this suit.

Plaintiff demands trial
by jury.


Wilson Hayes, Attorney for Plaintiff


FILED

JUL 3 0 1970

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

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 Wilburn Flowers

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.....

Wilburn Flowers

....., Defendant.....

by

Eula Henderson

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

Witness my hand this.....

30

day of

July 1920

Alice J. Luck Clerk

No. 9406

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Eula Henderson

Plaintiffs

vs.

Wilburn Flowers
Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JUL 30 1970

Clerk

ANCE J. DUCK

CLERK
REGISTER

W. Hayes
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

July 31 1970.....

Taylor Wilkins, Sheriff

I have executed this summons

this July 31 1970.....

by leaving a copy with

Wilburn Flowers

Taylor Wilkins, Sheriff

W. A. Talbert, Deputy Sheriff

EULA HENDERSON,

X

IN THE CIRCUIT COURT OF

Plaintiff,

X

vs.

X

BALDWIN COUNTY, ALABAMA

WILBURN FLOWERS,

X

AT LAW

NO. 9406

Defendant.

X

APPEARANCE

Come now Chason, Stone & Chason as attorneys for the Defendant in the above styled cause and file this their appearance on behalf of the said Defendant.

Pursuant to agreement with counsel to the Plaintiff no pleadings are filed at this time.

CHASON, STONE & CHASON

By:

John E. Chason

FILED

OCT 7 1970

ALICE J. DUCK

CLERK
REGISTER

EULA HENDERSON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
WILBURN FLOWERS,	X	AT LAW NO. 9406
Defendant.	X	

Comes now the Defendant in the above styled cause and for plea to the complaint heretofore filed in said cause, and to each count thereof, separately and severally, says, separately and severally, as follows:

1. Not guilty.

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 22 day of February, 1971.

John E. Chason

FILED

FEB 22 1971

EUNICE B. BLACKMON CIRCUIT CLERK