

MOSE HENDERSON,

Plaintiff,

Vs.

WILBURN FLOWERS,

Defendant.

X

X

X

X

X

I

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER:

9402

Plaintiff claims of Defendant the sum of Two Thousand Dollars (\$2,000.00) 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 Plaintiff's automobile and that as a proximate result of the said negligence of Defendant, Plaintiff's automobile was damaged in that the side, fender, frame, wheels and doors were bent, broken, gashed and damaged, hence this suit.

Wilson Hayes
Wilson Hayes, Attorney for Plaintiff

Plaintiff demands trial
by jury.

Wilson Hayes

FILED

JUL 3 0 1970

ALICE J. DUCK CLERK
REGISTER

No. 9402

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Defendant lives at

Received In Office

Mose Henderson

Plaintiffs

vs.

Wilburne Flowers

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JUL 30 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

W. Hayes

Plaintiff's Attorney

Defendant's Attorney

July 31 19 70

Taylor Stilkix Sheriff

I have executed this summons

this July 31 19 70

by leaving a copy with

Stilkix Flowers

Taylor Stilkix Sheriff

W. A. Bell Deputy Sheriff

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
Mose Henderson....., Plaintiff.....

Witness my hand this 30 day of July 1930

Alice J. Luck..... Clerk

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

September 3, 1971

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

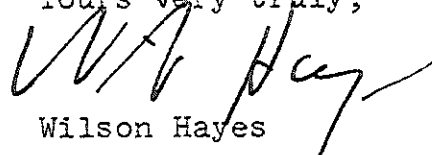
Re: Mose Henderson Vs. W. D.
Flowers and Eula Mae Henderson
Vs. W. D. Flowers, Cases #9406
and \$9407

Dear Eunice:

Please have these dismissed with prejudice and
forward to me the cost bill.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/ms

MOSE HENDERSON,	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
WILBURN FLOWERS,	X	AT LAW NO. 9407
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, and says, separately and severally, as follows:

1. Not guilty.
2. That at the time and place complained of, the Plaintiff was himself guilty of negligence which proximately contributed to his alleged injuries, hence he should not recover.

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, 1976

John E. Chason

FILED

FEB 22 1971

EUNICE B. BLACKMON CIRCUIT CLERK

MOSE HENDERSON,	X		
Plaintiff,	X	IN THE CIRCUIT COURT OF	
vs.	X	BALDWIN COUNTY, ALABAMA	
WILBURN FLOWERS,	X		
Defendant.	X	AT LAW	NO. 9407

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

6407

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