



PLAINTIFF FURTHER AVERS THAT ALL OF SAID DAMAGES AND INJURIES WERE AS A PROXIMATE RESULT OF THE NEGLIGENCE OF THE DEFENDANTS FOR ALL OF WHICH HE SUES.

COUNT TWO

PLAINTIFF CLAIMS OF THE DEFENDANTS ONE THOUSAND DOLLARS (\$1,000.00) FOR THAT ON, TO-WIT, SEPTEMBER 1, 1970, THE DEFENDANT, MRS. OLLIE B. JEMISON, DID OWN AND POSSESS AN AUTOMOBILE WHICH SHE DID THEN AND THERE LOAN TO HER SON, WILLIE EDWARD JEMISON, JR., A DEFENDANT, AND DID THEN NEGLIGENTLY PERMIT THE SAID WILLIE EDWARD JEMISON, JR. TO TAKE AND DRIVE THE SAME FOR HIS OWN PERSONAL PLEASURE AND ENTERTAINMENT, AND FOR THE PERSONAL BUSINESS OF THE SAID WILLIE EDWARD JEMISON JR.; AND PLAINTIFF FURTHER AVERS THAT THE SAID WILLIE EDWARD JEMISON, JR., WAS WHOLLY INCOMPETENT AND UNFIT TO DRIVE SAID AUTOMOBILE, AS WAS THEN WELL KNOWN TO THE SAID DEFENDANT, MRS. OLLIE B. JEMISON; AND ON SAID DATE AND ON SAID OCCASION THE SAID WILLIE EDWARD JEMISON, JR. BEING SO POSSESSED OF SAID AUTOMOBILE, AND IN SO CONTROL OF ITS OPERATION DID SO CARELESSLY, NEGLIGENTLY AND IMPROPERLY OPERATE SAID AUTOMOBILE ON U. S. HIGHWAY #98, A PUBLIC HIGHWAY IN THE TOWN OF DAPHNE, COUNTY OF BALDWIN, ALABAMA AT A POINT WHERE SAID U. S. HIGHWAY #98 IS INTERSECTED BY JOHNSON ROAD, DAPHNE, BALDWIN COUNTY, ALABAMA, AS A PROXIMATE RESULT OF WHICH NEGLIGENCE THE PLAINTIFF'S AUTOMOBILE WAS GREATLY DAMAGED, THE LEFT REAR FENDER AND LEFT DOOR WERE BENT AND BROKEN AND THE PLAINTIFF MUST SPEND LARGE SUMS IN AND ABOUT THE REPAIR OF THE SAID AUTOMOBILE; ALL TO THE PLAINTIFF'S DAMAGES AS AFORESAID, HENCE THIS SUIT.

COUNT THREE:

PLAINTIFF CLAIMS OF THE DEFENDANTS ONE THOUSAND DOLLARS (\$1,000.00) FOR THAT ON, TO-WIT, SEPTEMBER 1, 1970, THE DEFENDANT, MRS. OLLIE B. JEMISON, WAS THE OWNER OF A MOTOR CAR OF TREMENDOUS WEIGHT AND GREAT POWER WHICH SHE HAD ALLOWED HER SON, WILLIE

EDWARD JEMISON, JR., A DEFENDANT, TO OPERATE. THE SAID WILLIE EDWARD JEMISON, JR., ON THE DAY AFORESAID WAS, AND LONG HAD BEEN, A CARELESS, INCOMPETENT, INDIFFERENT, HEEDLESS AND RECKLESS DRIVER OF SUCH CAR, SO THAT SAID CAR, IN HIS HANDS WAS A DANGEROUS AND DEADLY AGENCY, OF WHICH SAID FACT, MRS. OLLIE B. JEMISON HAD BEEN DULY INFORMED; YET, WITH FULL INFORMATION OF SUCH FACTS, SHE ALLOWED HER SAID SON TO PROPEL SAID CAR ON AND ALONG U. S. HIGHWAY #98, A PUBLIC HIGHWAY IN THE COUNTY OF BALDWIN, ALABAMA; AT WILL, AND INTRUSTED ITS MANAGEMENT AND OPERATION TO HIM, ON THE DAY AND AT A POINT WHERE SAID ROAD IS INTERSECTED BY JOHNSON ROAD IN DAPHNE, BALDWIN COUNTY, ALABAMA; THE SAID WILLIE EDWARD JEMISON, JR., SO NEGLIGENTLY, HEEDLESSLY, INCOMPETENTLY, RECKLESSLY, WRONGFULLY AND INDIFFERENTLY CONDUCTED HIMSELF WITH RESPECT TO THE OPERATION OF THE SAID CAR THAT HE RAN THE SAME UPON OR AGAINST THE PLAINTIFF'S AUTOMOBILE; AND AS A DIRECT AND PROXIMATE CONSEQUENCE OF THE DEFENDANT'S NEGLIGENCE AFORESAID, PLAINTIFF'S AUTOMOBILE WAS GREATLY DAMAGED IN THAT THE LEFT REAR FENDER AND THE LEFT DOOR WERE BENT AND BROKEN, AND THE PLAINTIFF MUST SPEND LARGE SUMS IN AND ABOUT THE REPAIR OF THE SAME.

PLAINTIFF FURTHER AVERS THAT ALL OF SAID DAMAGES AND INJURIES WERE AS A PROXIMATE RESULT OF THE NEGLIGENCE OF THE DEFENDANTS FOR ALL OF WHICH HE SUES.

BAILEY & TAYLOR

By:  *Floyd E. Taylor*   
ATTORNEY FOR PLAINTIFF

FILED

OCT 28 1970

ALICE J. DUCK CLERK  
REGISTER

9525

5/11

Sheriff claims 108 miles at  
Ten Cents per mile Total \$ 10.80  
TAYLOR WILKINS, Sheriff  
BY W. Crook  
DEPUTY SHERIFF

Frank Swierz, Jr.  
Pltz

vs.

Mrs. Ullie B. Jemison  
& Willie Edward Jemison, Jr.  
P.O. Box 422  
Daphne, Ala.

MRS. O. B. Jemison  
928-7397  
Eddie Jemison  
928-2804

FILED

OCT 28 1970

ALICE J. DUCK  
CLERK  
REGISTER

Bailey + Taylor

Received 28 day of Oct 19 70  
and on 10 day of Nov 19 70  
I served a copy of the within SR  
ON Mrs. Ullie B. Jemison  
Willie Edward Jemison  
BY SERVICE ON Flora  
Aggie  
TAYLOR WILKINS, Sheriff  
BY W. Crook  
D. S.

2