

Law OFFICES
Cunningham, Bounds and Byrd

1350 DAUPHIN STREET
P. O. BOX 4486
MOBILE, ALABAMA 36604

ROBERT T. CUNNINGHAM
RICHARD BOUNDS
ROBERT L. BYRD, JR.
WARREN L. HAMMOND, JR.

AREA CODE 205
TELEPHONE 438-6188

December 15, 1970

9610
9611

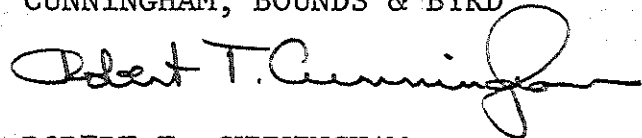
Mrs. Alice J. Duck
Clerk of Circuit Court
County Courthouse
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Will you please file the enclosed complaints and acknowledge receipt of same by returning the receipt with the date and case number indicated thereon?

Very truly yours,

CUNNINGHAM, BOUNDS & BYRD



ROBERT T. CUNNINGHAM

RTC/mb

OSCAR H. TAYLOR,	:	IN THE CIRCUIT COURT
Plaintiff,	:	OF BALDWIN COUNTY,
Vs.	:	ALABAMA
BEN D. BISHOP,	:	AT LAW
Defendant.	:	CASE NO. 9,610

D E M U R R E R

Comes now the Defendant in the above-styled cause and demurs to the Complaint, and to each Count thereof, separately and severally, and assigns the following separate and several grounds:


1. For that said Complaint does not state a cause of action.
2. For that it is not alleged that the Defendant owed any duty to the Plaintiff.
3. For that it is not alleged that the Defendant breached any duty owed to the Plaintiff.

JOHNSTON, JOHNSTON & KENDALL
Attorneys for Defendant

BY 
ROBERT G. KENDALL

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for all parties in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 29th day of January, 1971

Attorney for

FILED
FEB 1 1971

EUNICE B. BLACKMON CIRCUIT CLERK

1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the problem and the objectives of the research. The second part of the report is a detailed description of the methods used in the study. This includes a description of the experimental design, the data collection procedures, and the statistical methods used to analyze the data. The third part of the report is a discussion of the results of the study. This includes a description of the findings, a comparison of the results with previous research, and a discussion of the implications of the findings. The final part of the report is a conclusion and a list of references.

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9618

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AREA CODE 205
TELEPHONE 438-6188

March 3, 1971

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

Re: Taylor vs. Bishop
Cases No. 9610 and 9611

Dear Mrs. Duck:

On behalf of the plaintiffs in the above matter, please
dismiss these lawsuits and forward the cost bills to
Mr. Robert G. Kendall, attorney for the defendant.

Very truly yours,

CUNNINGHAM, BOUNDS & BYRD



ROBERT T. CUNNINGHAM

RTC.bcs

cc: Mr. Robert G. Kendall

OSCAR H. TAYLOR,)	IN THE CIRCUIT COURT
Plaintiff.)	OF BALDWIN COUNTY,
-vs-)	ALABAMA.
BEN D. BISHOP,)	AT LAW.
Defendant.)	CASE NO. <u>9610</u>

COUNT ONE

Plaintiff claims of the Defendant the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS, damages, for that heretofore and on, to-wit, June 13, 1970, the Defendant so negligently operated a motor vehicle on County Road 32 at its intersection with Clay City Road, both of said roads being public roads in Baldwin County, Alabama, as to cause the same to collide with the motor vehicle then and there operated by Plaintiff on said County Road 32, and as a direct and proximate result of the negligence of the Defendant as aforesaid, Plaintiff was injured and damaged as follows: his body was bruised and broken; he was made sick, sore and lame; he sustained severe lacerations about his face and body; he sustained severe chest injuries; he was injured internally; he was caused to suffer severe physical pain and mental anguish; he was permanently injured; he was caused to incur doctors' bills, hospital bills and other medical expenses in and about the treatment of his injuries; and his automobile was bent, broken and damaged.

Plaintiff avers that as a further direct and proximate result of the negligence of the Defendant as aforesaid, Plaintiff's wife, KATHLEEN P. TAYLOR, who was then and there a passenger in the motor vehicle of the Plaintiff, was injured and damaged as follows: her body was bruised and broken; she was made sick, sore and lame;

she sustained severe lacerations about her face and body; she sustained a fractured fibula and a fractured finger; she was permanently injured; and Plaintiff was caused to incur doctors' bills, hospital bills and other medical expenses in and about the treatment of his wife's injuries; and he was caused to lose the services and consortium of his wife over a period of time.

CUNNINGHAM, BOUNDS & BYRD
ATTORNEYS FOR PLAINTIFF

BY: Robert T. Cunningham
ROBERT T. CUNNINGHAM

Plaintiff demands a trial by jury.

Robert T. Cunningham
ROBERT T. CUNNINGHAM

TRIAL ATTORNEY: Robert T. Cunningham

FILED

DEC 1 1970

Address of Defendant:

Ben D. Bishop
Route 1, Box 42 (Clay City Road)
Fairhope, Alabama, Telephone No. 928-5231

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9610

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Ben D. Bishop

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.....

Ben D. Bishop
....., Defendant.....

by

Oscar H. Taylor
....., Plaintiff.....

Witness my hand this.....18th.....day of.....December.....19.70.....

Alice J. Week
..... Clerk

ef
12-29-70

No. 9610

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

OSCAR H. TAYLOR

Plaintiffs

vs.

~~RAY~~ D. BISHOP

Defendants

SUMMONS AND COMPLAINT

Filed 12/18/70 19.....

Alice J. Duck Clerk

CUNNINGHAM, BOUNDS & BYRD
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Dec. 18 1970

Taylor Wilkins Sheriff

I have executed this summons

this 29-Dec-1970

by leaving a copy with

CR

Bar D. Bishop

Sheriff charges 100 miles at

per mile Total \$10.00

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Sheriff

Deputy Sheriff