

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon Ivy Ann Reindl to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Alfred Holman.

WITNESS my hand this 18 day of June, 1971.

Eunice B. Blackman
Clerk

ALFRED HOLMAN,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
IVY ANN REINDL,	X	AT LAW 9889
Defendant.	X	

COUNT ONE:

The Plaintiff claims of the Defendant Fifteen Thousand Dollars (\$15,000.00) as damages for that on, heretofore, to-wit: the 30th day of January, 1971, at a point on U. S. Highway 98 approximately 0.4 of a mile North of the intersection of said Highway with Alabama Highway 104, and which point is a public highway in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon and against an automobile in which the Plaintiff was then and there riding as a passenger and as a proximate consequence and result of the negligence of the Defendant aforesaid,

the Plaintiff was severely injured and damaged in this: he suffered several broken ribs, he received a cut on his forehead, he suffered shock, he was made sick, sore and lame, he suffered great mental and physical pain and anguish, he was caused to incur doctor and medical bills, all as a proximate consequence and result of the negligence of the Defendant aforesaid, wherefore Plaintiff brings this suit and asks judgement in the above amount.

COUNT TWO

The Plaintiff claims of the Defendant Fifteen Thousand Dollars (\$15,000.00) as damages for that on, heretofore, to-wit: the 30th day of January, 1971, at a point on U. S. Highway 98 approximately 0.4 of a mile North of the intersection of said Highway with Alabama Highway 104, and which point is a public highway in Baldwin County, Alabama, the Defendant wantonly injured the Plaintiff by then and there wantonly operating a motor vehicle as to cause the same to run into, upon and against an automobile in which the Plaintiff was then and there riding as a passenger and as a proximate consequence and result of the wanton misconduct of the Defendant, the Plaintiff was wantonly injured and damaged in this: he suffered several broken ribs, he received a cut on his forehead, he suffered shock, he was made sick, sore and lame, he suffered great mental and physical pain and anguish, he was caused to incur doctor and medical bills, all as a proximate consequence and result of the wanton misconduct of the Defendant aforesaid, wherefore Plaintiff brings this suit and asks judgment in the above amount.

CHASON, STONE & CHASON

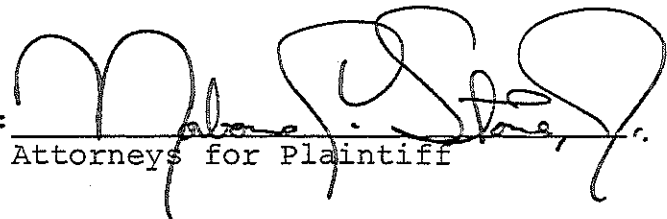
By: 

Attorneys for Plaintiff

The Plaintiff respectfully
demands a trial of this
cause by a jury.

CHASON, STONE & CHASON

By:


Attorneys for Plaintiff

Defendant's Address for Service:

3008 Curry Drive
Mobile, Alabama

MOBILE SHERIFF DEPT.
MOBILE COUNTY, ALA.

JUN 21 9 22 AM '71

BY _____

Received In Office

Date 10-25-71

WILSON BAKER

Sheriff, Dallas County, Ala.

By Beverly Milner

RETURNED 6/29/71

Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff

By C. B. Paquet D.S.

Executed this the 26 day of Oct, 1971

by leaving a copy of the within summons and complaint with

Iva Ann Reindl

Wilson Baker Defendant.
Sheriff of Dallas County, Ala.

By A. H. Chason
Deputy Sheriff, Dallas County, Ala.

10 Miles 1.00

Simmy Fee 1.50
2.50

ALFRED HOLMAN,

Plaintiff,

vs.

IVA ANN REINDL,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

OCT 28 1971

AT LAW JAMES WILKINS
SHERIFF

SUMMONS ~~AND COMPLAINT~~

***** JUN 18 1971 *****

EUNICE B. BLACKMON
CIRCUIT CLERK

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

ALFRED HOLMAN, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
-vs- : AT LAW
IVY ANN REINDL, : CASE NO. 9889
Defendant. :

COMES NOW the Defendant in the above-styled cause and demurs to the Plaintiff's complaint and to each count thereof, separately and severally and as grounds therefor sets down and assigns the following grounds, separately and severally:

1. For aught that appears from said count there is no duty owed by this defendant to the plaintiff.
2. For aught that appears from said count there is no breach of any duty owed by this defendant to the plaintiff.
3. For aught that appears from said count the injuries and damages of which the plaintiff complains were not the proximate result of any act or failure to act on the part of this defendant.
4. For aught that appears from said count the wantonness complained of describes the act and not the injury.

LYONS, PIPES AND COOK
Attorneys for the Defendant

By: 

GORDON B. KAHN

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 9
day of Nov, 19 1971, served a
copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same
by United States mail, properly addressed and
first class postage prepaid.

FILED

NOV 10 1971


EUNICE B. BLACKMON CIRCUIT CLERK

ALFRED HOLMAN, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
-vs- : AT LAW
IVY ANN REINDL, : CASE NO. 9889
Defendant. :

COMES NOW the Defendant, Ivy Ann Reindl and for answer to the Plaintiff's Complaint and to each count thereof, separately and severally, says as follows, separately and severally:

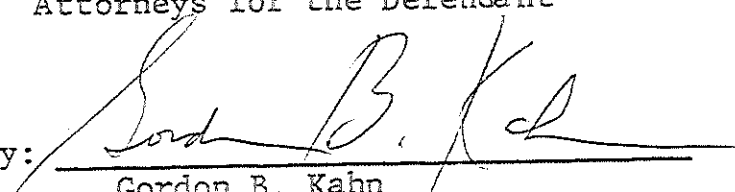
1. Not guilty.
2. The material allegations of the Complaint are untrue.
3. This defendant says that at the time and place complained of in the complaint the plaintiff's wife so negligently operated a motor vehicle at said time and place averred in the complaint so as to proximately contribute to the injuries and damages of which the plaintiff's wife complains, hence this plaintiff ought not have and recover of this defendant.

LYONS, PIPES AND COOK
Attorneys for the Defendant

FILED

FEB 21 1972

By:


Gordon B. Kahn

EUNICE B. BLACKMON CIRCUIT
CLERK

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 20 day of February, 19 1972, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.