

[illegible]

COUNT ONE

Plaintiff claims of the Defendant the sum of SEVENTY FIVE THOUSAND AND NO/100 (\$75, 000.00) DOLLARS, damages, for that heretofore and on, to-wit, December 6, 1971, the Defendant did so negligently operate a motor vehicle on Cedar Street, at or near its intersection with Laural Avenue, both of said streets being public streets in the County of Baldwin, State of Alabama, so as to cause or allow said motor vehicle to collide with the Plaintiff's motor vehicle which he was operating on Laural Avenue at said time and place and as a direct and proximate result of the aforesaid negligence of the Defendant, the Plaintiff suffered the following injuries and damages: he was made sick, sore and lame; he was bruised and contused; he was caused to suffer a severe injury to his nose; he was permanently injured; he was caused to incur medical and hospital expenses in and about the care and treatment of his injuries and will be caused to incur further expenses in the future; he was caused to suffer severe physical and mental pain and anguish, still so suffers and will so suffer in the future; he was caused to undergo an operation for the injuries to his nose; he was caused to lose time from his place of employment and his income was caused to be less because of said injuries; his motor vehicle, was bent, broken and damaged and was caused to depreciate in value; hence this suit.

STOCKMAN, BEDSOLE & KIMBROUGH  
Attorneys for the Plaintiff

BY: Billy C Bedsole  
BILLY C BEDSOLE

Plaintiff demands a trial by jury in this cause.

  
BILLY C. BEDSOLE

Defendant's address:

405 West Myrtle Avenue  
Foley, Alabama 36535

FILED

MAY 16 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

SUMMONS AND COMPLAINT

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,393

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Deborah Ann Rhodes

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.....

Deborah Ann Rhodes Defendant.....

by James Edward Parker, Jr. Plaintiff.....

witness my hand this 16th day of May 1972

Eunice B. Blackman, Clerk

No. 10,393

Page.....

STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

JAMES EDWARD PARKER, JR.

Plaintiffs

VS.

DEBORAH ANN RHODES

Defendants

SUMMONS AND COMPLAINT

Filed May 16, 1972

Eunice B. Blackmon Clerk

MAY 23 1972

JAIL

Stockman, Bedsole & Kimbrough  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this May 24 1972

by leaving a copy with

(2) Deborah Ann Rhodes

72  
Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Deputy Sheriff

JAMES EDWARD PARKER, JR., § IN THE CIRCUIT COURT  
Plaintiff, § OF BALDWIN COUNTY,  
VS. § ALABAMA  
DEBORAH ANN RHODES, §  
Defendant § CASE NO. 10,393

Comes now the Plaintiff in the above styled cause and amends the body of his Complaint to read in its entirety as follows:

COUNT ONE

Plaintiff claims of the Defendant the sum of SIXTY THOUSAND AND NO/100 (\$60,000.00) DOLLARS, damages, for that heretofore and on, to-wit, December 6, 1971, the Defendant did so negligently operate a motor vehicle on Cedar Street, at or near its intersection with Laural Avenue, both of said streets being public streets in the City of Foley, County of Baldwin, State of Alabama, so as to cause or allow said motor vehicle to collide with the Plaintiff's motor vehicle which he was operating on Laural Avenue at said time and place and as a direct and proximate result of the aforesaid negligence of the Defendant, the Plaintiff suffered the following injuries and damages: he was made sick, sore and lame; he was bruised and contused; he was caused to suffer severe injury to his nose; he was permanently injured; he was caused to incur medical and hospitalization expenses in and about the care and treatment of his injuries and will be caused to incur further such expenses in the future; he was caused to suffer severe physical and mental pain and anguish, still so suffers and will so suffer in the future; he was caused to undergo an operation for injuries to his nose; he was employed at the Kopy-King Company in Mobile, Alabama and was caused to lose time from his place of employment and his income was caused to be less because of said injuries; his motor vehicle was bent, broken and damaged in that the radiator was busted, both of the front fenders were bent and mashed in, the frame of said automobile was bent, both of the front headlights were smashed, the front

bumper and hood were bent and broken, the grill was bent and the motor was damaged; hence this suit.

STOCKMAN, BEDSOLE & KIMBROUGH  
Attorneys for the Plaintiff

BY: Billy C. Bedsole  
BILLY C. BEDSOLE

**CERTIFICATE OF SERVICE**

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

This 23 day of June, 19 72

Billy C. Bedsole  
STOCKMAN, BEDSOLE  
& KIMBROUGH, Attorneys

**FILED**

JUN 26 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

JAMES EDWARD PARKER, JR.,     §     IN THE CIRCUIT COURT  
Plaintiff                             §     OF BALDWIN COUNTY,  
VS.                                     §     ALABAMA  
DEBORAH ANN RHODES,             §     AT LAW  
Defendant                             §     CASE NO. 10, 393

ORDER APPOINTING GUARDIAN *AD LITEM*

It being shown to this Honorable Court that the Defendant, DEBORAH ANN RHODES in the above styled cause is a minor under the age of twenty-one years and it appearing to the Court that JOHN CHASON, Attorney at Law, is a fit and proper person to act as Guardian for said minor defendant and defend their actions in this suit,

It is therefore ORDERED, ADJUDGED AND DECREED by this Honorable Court that JOHN CHASON, be and he is hereby appointed Guardian<sup>*ad litem*</sup> for the minor Defendant herein and is directed and authorized to defend the above entitled action in her behalf.

*John A. Madhew*  
JUDGE, CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

FILED

MAY 23 1972

EUNICE B. BLACKMON     CIRCUIT  
CLERK

§ IN THE CIRCUIT COURT

§            OF BALDWIN COUNTY,

§ ALABAMA

§

§ CASE NO. 10392

MOTION FOR APPOINTMENT OF GUARDIAN

Comes now the Plaintiff in the above styled cause and shows unto this Honorable Court that the Defendant in the above styled cause is under twenty-one years of age and the Plaintiff would respectfully move this Honorable Court to appoint a Guardian to represent said minor in these proceedings.

STOCKMAN, BEDSOLE & KIMBROUGH  
Attorneys for the Plaintiff

BY: Billy C. Bedsole  
BILLY C. BEDSOLE

Defendant's address:

405 West Myrtle Avenue  
Foley, Alabama 36535

**FILED**

MAY 16 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK



10,393

LAW OFFICES  
STOCKMAN, BEDSOLE & KIMBROUGH  
951 GOVERNMENT STREET BUILDING - FIRST FLOOR  
MOBILE, ALABAMA 36604

SAMUEL L. STOCKMAN  
BILLY C. BEDSOLE  
W. A. KIMBROUGH

August 10, 1972

P. O. BOX 4483  
TELEPHONE 432-0735  
AREA CODE (205)

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

Re: James Edward Parker, Jr., vs. Deborah Ann Rhodes  
Case No. 10,393

Dear Mrs. Blackmon:

Please dismiss the above styled case on motion of the Plaintiff and send the costs bill to my office.

Very truly yours,

STOCKMAN, BEDSOLE & KIMBROUGH

*Billy C. Bedsole*  
Billy C. Bedsole

BCB/cdw

JAMES EDWARD PARKER, JR.,

Plaintiff,

vs.

DEBORAH ANN RHODES,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,393

DEMURRER

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That said Complaint does not allege any duty owing by the Defendant to the Plaintiff.
3. That said Complaint names the streets where the accident occurred but does not allege in what City the accident occurred.
4. That the place where the accident occurred is not sufficiently set out.
5. The injuries which the Plaintiff received are not sufficiently set out.
6. That said Complaint claims speculative damages.
7. That said Complaint claims damages for loss of time but does not state that he was employed at the time of his injury.
8. The damages to the motor vehicle are not sufficiently set out in the Complaint.

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 6 day

of June

1972

*Reson, Stone, Hanson*  
Attorneys for Defendant

FILED

JUN 6 1972

EUNICE B. BLACKMON CIRCUIT CLERK

JAMES EDWARD PARKER, JR.,

Plaintiff,

vs.

DEBORAH ANN RHODES,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW                      NO. 10,393

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

LAW OFFICES  
STOCKMAN, BEDSOLE & KIMBROUGH  
951 GOVERNMENT STREET BUILDING - FIRST FLOOR  
MOBILE, ALABAMA 36604

SAMUEL L. STOCKMAN  
BILLY C. BEDSOLE  
W. A. KIMBROUGH

May 22, 1972

P. O. BOX 4483  
TELEPHONE 432-0735  
AREA CODE (205)

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

Re: James Edward Parker, Jr., vs.  
Deborah Ann Rhodes  
Case No. 10,393

Dear Mrs. Blackmon:

I have enclosed an Order appointing John Chason as guardian for the minor defendant in the above styled cause. He is the attorney who represents the insurance company in this case and I am sure he will be perfectly agreeable to acting as guardian for the minor.

Please let me know if you have any questions in this matter.

Very truly yours,

STOCKMAN, BEDSOLE & KIMBROUGH

  
BILLY C. BEDSOLE

BCB/cdw

Enclosure

May 16, 1972

Stockman, Bedsole & Kimbrough  
P. O. Box 4483  
Mobile, Alabama 36604

Attention: Billy C. Bedsole

Re: James Edward Parker, Jr. vs. Deborah Ann Rhodes  
Case # 10,393

Gentlemen:

The above style cause was received and filed in this court this 16th day of May and given number 10,393. Please prepare and mail me an appointment of Guardian Order for either I or the Judge to make such an appointment for this case. I shall hold your complaint on my desk so that service can be had on defendant and guardian at the same time, if you wish service of complaint on said guardian.

Yours very truly,

Clerk, Circuit Court  
Baldwin County, Alabama

BBB/ass

LAW OFFICES  
STOCKMAN, BEDSOLE & KIMBROUGH  
951 GOVERNMENT STREET BUILDING - FIRST FLOOR  
MOBILE, ALABAMA 36604

SAMUEL L. STOCKMAN  
BILLY C. BEDSOLE  
W. A. KIMBROUGH

May 15, 1972

P. O. BOX 4483  
TELEPHONE 432-0735  
AREA CODE (205)

Clerk  
Circuit Court of Baldwin County  
Baldwin County Court House  
Bay Minette, Alabama 36507

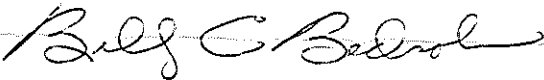
Dear Sir:

I have enclosed an original and two copies of a Complaint and Motion For Appointment Of Guardian, which I would ask to be filed in the Circuit Court of Baldwin County, Alabama. I would ask that you sign one copy of both the Complaint and the Motion at the bottom and return to me in the stamped self-addressed envelope.

I appreciate your consideration in this matter, and I would appreciate your notification of any future hearing on the pleadings in this case.

Very truly yours,

STOCKMAN, BEDSOLE & KIMBROUGH



BILLY C. BEDSOLE

BCB/cdw

Enclosures-7