

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 James Larry Bonner and Douglas Pierce 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 Annie Ruth Brill.

Witness my hand this 23 day of June, 1972.

Eunice B. Blackmon
Clerk

ANNIE RUTH BRILL,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

X

JAMES LARRY BONNER and
DOUGLAS PIERCE,

X

AT LAW

Defendants.

X

X

10,459

COUNT ONE

The Plaintiff claims of the Defendants the sum of Five Thousand Dollars (\$5,000.00) as damages for that heretofore on, the 30th day of August, 1971, at a point on Old Highway 90 approximately 3.1 miles East of Robertsedale, in Baldwin County, Alabama,

(a) The Defendant James Larry Bonner while operating a motor vehicle in an Easterly direction on said road at said time and place so negligently operated said motor vehicle as to cause or allow it to enter into the West bound land of said Highway and

run into, upon or against the motor vehicle being driven at said time and place by the Plaintiff, and as a proximate consequence of the negligence of the said Defendant, James Larry Bonner, the Plaintiff was then and there damaged as hereinafter set forth.

(b) The Defendant, Douglas Pierce, while operating a motor vehicle on said road at said time and place in a Westerly direction and proceeding in front of the vehicle being driven by the Plaintiff did so negligently operate said motor vehicle as to cause or allow the motor vehicle operated by the Defendant Bonner to enter into the West bound lane of traffic on said Highway and to run into, upon or against the vehicle being then and there operated by the Plaintiff and as a direct and proximate result of said negligence of the Defendant Pierce, the Plaintiff was injured and damaged as hereinafter set forth.

(c) And the Plaintiff alleges that said injuries and damages to her were the proximate result of the combined and concurring negligence of the Defendants in and about the operation of their respective motor vehicles at said time and place, and the Plaintiff was therefore caused to and did sustain injuries and damages as follows:

(d) She was cut, bruised, lacerated, scarred and permanently injured about her head and face; she sustained a brain concussion; she has undergone extensive medical treatment which was necessary for the treatment or repair of a large scalp and facial laceration including plastic surgery thereon and in such connection has sustained large medical and hospital bills.

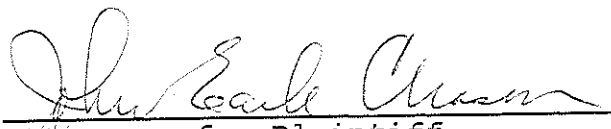
CHASON, STONE & CHASON

By: John Earl Chason
Attorneys for Plaintiff

The Plaintiff respectfully demands

a trial of this cause by a jury.

CHASON, STONE & CHASON

By: 
Attorneys for Plaintiff

FILED

JUN 23 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

1-26-74
Draft Bonner not found in Bal.
Co. J. M. Byrd
RECEIVED

DEC 13 1973

TAYLOR WILKINS
SHERIFF

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF
8-74

Sheriff claims
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF
8-74

of Mr. Larry Bonner
served 2-8-74 13 14 7 14 all

New date

Received 14 Feb. 74
on 27 day of June 1972

and on day of 1972

I served a copy of the within
on Mr. Larry Bonner, 15-8-74
Douglas Pierce 7-12-72

By service on

TAYLOR WILKINS, Sheriff
By 14 7 ball D.S.
50 mi R Dale

10,459

ANNIE RUTH BRILL,
Plaintiff,

VS.

JAMES LARRY BONNER and
DOUGLAS PIERCE, R Dale

Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

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FILED

SUMMONS AND COMPLAINT
JUN 23 1972

* * * LUNICE B. BLACKMON * * *
CLERK

JUN 23 1972

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

JURY LIST - JULY SESSION CIVIL TERM 1974 - JULY 22, 1974

1. Gilheart, Russell; Carpenter, 451 Magnolia, Fairhope
2. Green, Harold Keo; Forester, 1200 Hand Ave., Bay Minette
3. Spears, Vernon M.; Mgr. Dool Gas of Fairhope, 606 Johnson Ave., Fairhope
4. Yarbrough, Jacqueline B.; Teller-Bald. Co. Bk, 805 Moog Ave., Bay Minette
5. Griffin, W. Max; Self Emp. Union 76 Co., Drawer 428, Foley
6. Fairley, Sam; Bald Oil Mills, Oak St., Foley
7. Moorer, Lee Ella; Housewife, 412 Old Hurricane Rd., Bay Minette
8. Ellis, George L.; Mech Pensacola NAS, 512 Grand Av., Fairhope, Pensacola
9. Busch, Thomas N.; Forester Int. Paper Co., 1217 Lovett La., Daphne
10. Plovovich, George M.; Mach. Opr. Standard Furn., Perdido, Bay Minette
11. Stanford, John N.; Insurance Salesman, 1001 Marks Ave., Bay Minette
12. Allen, Leslie, Jr.; U. S. Post Office, 56 Daphmont Dr., Daphne
13. Ball, Nellie; Housewife, 619 Hilton Ave., Bay Minette
14. Lipscomb, Robert; Mgr. Table Division, Standard Furniture, Star Route Box 6A, Bay Minette
15. Booth, James D.; Salesman, Fish River RFD, Fairhope, Mobile
16. Brewton, Andy; Bay; Cutter Scott Paper, Robertsdale, Mobile
17. Cooper, James; International Paper, Route 2 Box 269-A-a, Bay Minette
18. Cooper, Sharon; Clerk Tax Assessor, Route 2 Box 269-A2, Bay Minette
19. Vines, June K.; Housewife, 1600 Mooge Ave., Bay Minette
20. Phelps, Rufus; Owner Phelps Supply, N. McKenzie, Foley
21. Hunt, Sandra; Housewife, Forrest Park Ave., Bay Minette
22. Owens, John; Clerk Ruffles Co., 200 Magnolia Ave., Fairhope
23. Jeffery, Wm. A.; Asst Cashier Merch. Natl Bk, 607 Spanish Main St., Spanish Fort, Mobile
24. Hall, David E.; Elect. Scott Paper Co., 12 Fels Ave., Fairhope, Mobile
25. Johnson, Doretha B.; South Bald. Mills, 407 White Ave., Fairhope, Robertsdale
26. King, Eugene; Laborer, Kennedy's, Gen. Del., Summerdale
27. Koehler, Evelyn Mrs.; Housewife, Box 218, Elberta
28. Hall, Rita M.; Housewife, 12 Fels Av., Fairhope
29. Turner, Mrs. Juanita; Housewife, 107A E. 6th St., Bay Minette
30. Horton, Lowell C.; Horton Concrete Pipe, 518 Genl Gibson Dr., Spanish Fort
31. Gummis, Charles B., Jr.; Gun Smith, 201 Young St., Fairhope
32. Cassebaum, Otto G.; Mechanic Foley Imp., Elberta, Foley
33. Stowe, Horace J.; Pres Stowe's Jwlr's, 408 Myrtle Av., Fairhope
34. Davis, Ella Mae; House Maid Beasley's Rest Home, 563 Middle St., Fairhope
35. Howard, Charles; Laborer, Star Route A, Stockton
36. Richerson, La Velle J.; Controller Int. Paper Co., 125 Fairway Dr., Daphne, Mobile
37. Foley, Sue; Housewife, 1711 Auburn Av., Bay Minette
38. Schreck, Paul C.; Boat Works, Route, Lillian
39. McKissick, James D.; Mut of Omaha Ins., 1201 McMillan, Bay Minette
40. Crosby, John D., Jr.; Sawmill, 602 E 6th St., Bay Minette
41. Moore, Byrd L.; Design Eng Ala Dry Dock, 151 Blue Island, Fairhope, Mobile
42. Childre, L. J., Jr.; Fishing Poles, P. O. Box 63, Foley, Ala.

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IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

ANNIE RUTH BRILL,

Plaintiff,

VS.

JAMES LARRY BONNER and
DOUGLAS PIERCE,

Defendants.

CIVIL ACTION NO. 10, \$59

ANSWER

Answer #1

The Defendant, James Larry Bonner, says that he is not guilty of the matters alleged in this Bill of Complaint.

Answer #2

The Defendant, James Larry Bonner, says that Annie Ruth Brill was driving a vehicle along or upon U. S. Highway #90 on the date and at the place set out in this Bill of Complaint; that she so negligently operated her motor vehicle as to cause or allow it to run into the vehicle being operated by said Defendant and that the damages claimed are the direct and proximate consequence of her said negligence.

Answer #3

The Defendant, James Larry Bonner, avers that, at the time and place set forth in the Bill of Complaint, the Defendant, Douglas Pierce, suddenly and negligently turned the vehicle he was driving across the lane of traffic in which the Defendant Bonner was traveling and as a direct and proximate consequence of said negligence, the damages complained of were caused.

WILTERS & BRANTLEY

BY:

S M Brantley
Attorneys for Defendant, James
Larry Bonner
P. O. Box 968
Bay Minette, Alabama 36507

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 9 day of March 1974 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.

WILTERS & BRANTLEY

S M Brantley

FILED

MAR 4 1974

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72 PAGE 534

EUNICE B. BLACKMON CIRCUIT CLERK

2. We the jury find in favor of the Plaintiff Mrs. Beill
and against the Defendant Mr. Pierce, and assess the amount of ~~his~~
her damages at \$ 5,000.⁰⁰.

Lowell C. Horton
Fremont