

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 Thomas O. Brill.

Witness my hand this 23 day of June, 1972.

Eunice B. Blackmon
Clerk

THOMAS O. BRILL,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
JAMES LARRY BONNER	X	AT LAW
and DOUGLAS PIERCE,	X	
Defendants.	X	# 10,461

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Three Thousand Seven Hundred Dollars (\$3,700.00) as damages for that, heretofore, on, to-wit: the 30th day of August, 1971, at a point on Old Highway 90 approxiamtely 3.1 miles East of Robertsdale 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 lane of said Highway and run into, upon or against the motor vehicle of the Plaintiff and as a proximate consequence of the negligence of the said Defendant, James Larry Bonner, the vehicle of 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 of 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 of the Plaintiff and as a direct and proximate result of said negligence of the Defendant Pierce, the Plaintiff's automobile was damaged as hereinafter set forth.

(c) And the Plaintiff alleges that said damages to his vehicle 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's vehicle thereforesustained the following damages:

(d) The vehicle of the Plaintiff, a 1971 Oldsmobile, 4-door automobile, was a total loss.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

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

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

FILED

JUN 23 1972

EUNICE B. BLACKMON CIRCUIT CLERK

Co. Subject attending U. of Ala.
Tuscaloosa Co.

JM Byrd

10,461

THOMAS O. BRILL,
Plaintiff,

VS.

JAMES LARRY BONNER and
DOUGLAS PIERCE,
Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

JUN 23 1972
AT LAW

* * * * * EUNICE B. BLACKMON CIRCUIT CLERK * * * * *

SUMMONS AND COMPLAINT

JUN 23 1972

* * * * *

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

RECEIVED

DEC 13 1973

TAYLOR WILKINS
SHERIFF

Sheriff claims
Ten Cents per mile Total \$ 3.00
TAYLOR WILKINS, Sheriff
BY Hall DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff

By H. F. Hall D.A.

R. Dale

50 mi

James Larry Bonner
Served 2-8-74

14 7 1/2 Hall

30 miles

4 Feb. 74 date

Received 23 day of June 19 72

and on day of 19 72

I served a copy of the within
on James Larry Bonner 2-8-74
Douglas Pierce 7-12-72

By service on

Sheriff claims 23 miles at

Ten Cents per mile Total \$ 3.00

TAYLOR WILKINS, Sheriff

BY Hall DEPUTY SHERIFF

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

THOMAS O. BRILL,

Plaintiff,

VS.

JAMES LARRY BONNER
and DOUGLAS PIERCE,

Defendants.

CIVIL ACTION NO. 10,461

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: Sm 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 1st 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

By: Sm Brantley

MAR 4 1974

EUNICE E. BLACKMON CIRCUIT CLERK

