

BAILEY & TAYLOR
ATTORNEYS AT LAW
61 NORTH SECTION STREET
P. O. BOX 361
FAIRHOPE, ALABAMA 36532

JULY 28, 1972

MRS. EUNICE BLACKMON
CLERK OF COURT
BAY MINETTE, LA., 36507

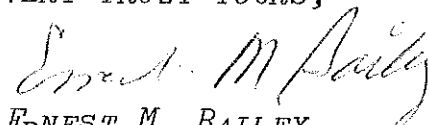
RE: BRADY VS MARSHALL
CASE # 10,470

DEAR EUNICE:

PLEASE DISMISS THE ABOVE CASE AND FORWARD
THE COST BILL TO HARTFORD INSURANCE Co.,
P.O. Box 4125, MOBILE, ALA., 36604, FOR
THE ATTENTION OF MR. ERDMAN.

THANKING YOU FOR YOUR ASSISTANCE IN THIS
MATTER I AM

VERY TRULY YOURS,



ERNEST M. BAILEY
EMB/w

CC: MR. ERDMAN

STATE OF ALABAMA }
COUNTY OF BALDWIN }

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED TO SUMMON CLAUDIA MARSHALL
AND SHIRLEY JEAN MARSHALL, TO APPEAR AND ANSWER, PLEAD OR DEMUR,
WITHIN THIRTY DAYS FROM THE SERVICE HEREOF, TO A BILL OF COMPLAINANT
FILED IN THIS COURT BY HENRY M. BRADY AS PLAINTIFF, AGAINST CLAUDIA
MARSHALL AND SHIRLEY JEAN MARSHALL, AS DEFENDANTS, AND AT THE SAME
TIME MAKE RETURN OF YOUR ACTIONS HEREUNDER.

WITNESS MY HAND THIS THE 29 DAY OF June
1972.

Eunice B. Blackmon
~~REGISTER~~ CLERK

HENRY M. BRADY,
PLAINTIFF
VS
CLAUDIA MARSHALL AND
SHIRLEY JEAN MARSHALL,
DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NUMBER: 10470

COUNT ONE:

PLAINTIFF CLAIMS OF THE DEFENDANTS FOURTEEN HUNDRED
DOLLARS (\$1,400.00) FOR THAT ON, TO-WIT, MARCH 14, 1972, THE
DEFENDANT CLAUDIA MARSHALL DID OWN AND POSSESS A 1966 FORD AUTO-
MOBILE, WHICH WAS THEN AND THERE BEING OPERATED BY THE DEFENDANT
SHIRLEY JEAN MARSHALL IN THE CITY OF FAIRHOPE, BALDWIN COUNTY,
ALABAMA, AT A POINT, TO-WIT, 200 YARDS WEST OF THE INTERSECTION
OF SECTION STREET AND BALDWIN COUNTY HIGHWAY NUMBER ELEVEN (11),
A PUBLIC HIGHWAY, AS AUTHORIZED AGENT, SERVANT OR EMPLOYEE OF THE
DEFENDANT CLAUDIA MARSHALL, WHO WAS THEN AND THERE ACTING WITHIN
LINE AND SCOPE OF HER EMPLOYMENT, DID NEGLIGENTLY CAUSE OR ALLOW
THE VEHICLE TO RUN OVER, AGAINST THE VEHICLE DRIVEN BY THE PLAIN-
TIF, AND HAS AS PROXIMATE RESULT OF WHICH NEGLIGENCE, THE PLAIN-
TIF'S AUTOMOBILE, TO-WIT, A 1968 OLDSMOBILE STATION WAGON WAS

GREATLY DAMAGED IN THIS; THE LEFT SIDE OF THE PLAINTIFF'S AUTOMOBILE WAS BENT AND BROKEN, THE LEFT DOOR AND FENDERS WERE BENT AND BROKEN AND THE PLAINTIFF WAS REQUIRED TO SPEND LARGE SUMS ABOUT THE REPAIR OF SAID AUTOMOBILE AND WAS CAUSED A LOSS OF TRANSPORTATION IN AND ABOUT HIS BUSINESS; HE WAS CAUSED TO EXPEND GREAT SUMS FOR A RENTAL AUTOMOBILE FOR THE USE IN HIS BUSINESS; ALL TO THE PLAINTIFF'S DAMAGES AS AFORESAID, HENCE THIS SUIT.

COUNT TWO:

PLAINTIFF CLAIMS OF THE DEFENDANTS THE SUM OF FOURTEEN HUNDRED DOLLARS (\$1,400.00) FOR THAT ON TO-WIT, MARCH 14, 1972, THE DEFENDANT CLAUDIA MARSHALL WAS THE OWNER OF A 1966 FORD AUTOMOBILE, WHICH WAS BEING DRIVEN BY HER DAUGHTER, SHIRLEY JEAN MARSHALL, AT A POINT IN THE CITY OF FAIRHOPE, BALDWIN COUNTY, ALABAMA, AT A POINT, TO-WIT, 200 YARDS WEST OF THE INTERSECTION OF SECTION STREET AND BALDWIN COUNTY HIGHWAY # 11, A PUBLIC HIGHWAY, AND THE DEFENDANT SHIRLEY JEAN MARSHALL, AS AGENT, SERVANT OR EMPLOYEE OF THE DEFENDANT CLAUDIA MARSHALL DID NEGLIGENTLY, RECKLESSLY, WRONGFULLY AND INDIFFERENTLY OPERATE HER VEHICLE AS TO ALLOW THE SAME TO RUN OVER AND AGAINST THE AUTOMOBILE OPERATED BY THE PLAINTIFF AND AS A DIRECT AND PROXIMATE CONSEQUENCE OF THE DEFENDANTS NEGLIGENCE AS AFORESAID, PLAINTIFF'S AUTOMOBILE WAS GREATLY DAMAGED IN THIS; THAT THE LEFT SIDE OF HIS AUTOMOBILE WAS BENT AND BROKEN; THE LEFT DOOR AND FENDERS WERE BENT AND BROKEN AND THE PLAINTIFF WAS MADE TO SPEND LARGE SUMS IN AND ABOUT THE REPAIR OF THE SAME; THE PLAINTIFF LOST THE USE OF HIS AUTOMOBILE DURING THE TIME OF ITS REPAIR AND THE USE IN HIS BUSINESS AND WAS REQUIRED TO SPEND LARGE SUMS OF MONEY FOR A RENTAL AUTOMOBILE TO BE USED IN HIS BUSINESS.

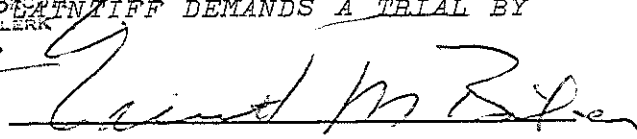
PLAINTIFF AVERS THAT ALL OF SAID DAMAGES AND INJURIES WERE AN PROXIMATE RESULT OF THE NEGLIGENCE OF THE DEFENDANTS, FOR ALL OF WHICH HE SUES.

FILED

JUN 29 1972

BAILEY & TAYLOR

BY: 

FOR THE TRIAL IN THIS CAUSE
EUNICE B. BLACKWELL, PLAINTIFF DEMANDS A TRIAL BY
JURY. 

RECEIVED

JUN 30 1972

TAYLOR WILKINS
SHERIFF

Sheriff claims _____ miles at _____
Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff
BY _____
DEPUTY SHERIFF

Received 30 day of June 1972
and on 30 day of June 1972
I served a copy of the with n
on Claudia Marshall
Shirley Jean Marshall
By service on Claudia Marshall
Shirley Jean Marshall
TAYLOR WILKINS, Sheriff
D.S.

BILL OF COMPLAINT

HENRY M. BRADY,

PLAINTIFF

VS

CLAUDIA MARSHALL AND
SHIRLEY JEAN MARSHALL,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NUMBER: 10,470

FILED

JUN 29 1972

DEFENDANTS MAY BE SERVED AT

55 So. School St.,
FAIRHOPE, ALABAMA