

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon VIRGINIA K. DUDDY
..... ROUTE I, BOX 385, FOLEY, ALABAMA
.....
.....
.....

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.....

..... Virginia K. Duddy
....., Defendant.....

by CHARLOTTE POPE, a minor, by and through her next friend and
..... mother, SARAH R. HARRIS,
....., Plaintiff.....

Witness my hand this 25th day of July 19 72

Emmari D. Blackburn Clerk

No. 10,507

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

CHARLOTTE POPE, a minor, by
and through her next friend and
mother, SARAH R. HARRIS,

Plaintiffs

vs.

VIRGINIA K. DUDDY

Defendants

SUMMONS AND COMPLAINT

Filed 7/25/72 19.....

FILED

Clerk

JUL 25 1972

EUNICE B. BLACKMON

CIRCUIT
CLERK

J. CONNOR OWENS, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route I, Box 385
Foley, Alabama

RECEIVED
Received in Office

JUL 26 1972

19.....

TAYLOR WILKINS

Sheriff

I have executed this summons

this July 28 1972

by leaving a copy with

Virginia K. Duddy

Sheriff claims 72 miles at

Ten Cents per mile Total \$7.20

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

Sheriff

Deputy Sheriff

CHARLOTTE POPE, a minor,
by and through her next
friend and Mother, SARAH
R. HARRIS,

Plaintiff,

vs.

VIRGINIA K. DUDDY,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO: 10,507

PLEA

Comes now the Defendant, Virginia K. Duddy, by her
attorneys, and for answer to the Complaint heretofore filed,
pleads, separately and severally, as follows:

1. Not guilty.

2. That at the time and place complained of in the
Complaint, the Plaintiff was guilty of negligence which was the
proximate cause of her injuries and damages in that at such time
and place she negligently slowed down or stopped her motor
vehicle directly in the path of the vehicle driven by the Defendant,
without giving a signal, and her injuries and damages are the
proximate result of her own negligence.

CHASON, STONE & CHASON

BY:

Charles C. Porter

Attorneys for Defendant

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 25 day
of August, 1972

Charles C. Porter

FILED

AUG 25 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

CHARLOTTE POPE, a minor,
by and through her next
friend and Mother SARAH
R. HARRIS,

Plaintiff,

vs.

VIRGINIA K. DUDDY,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

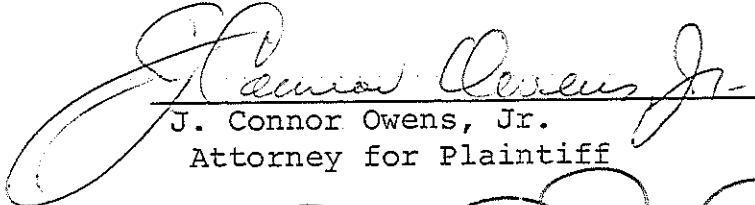
AT LAW

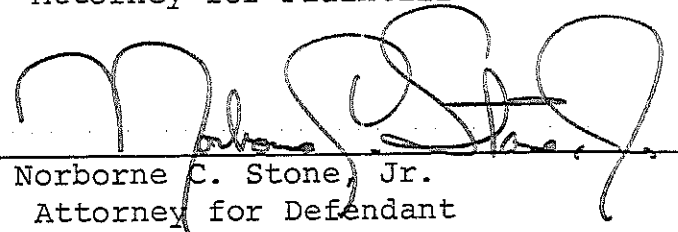
NO. 10,507

STIPULATION FOR DISMISSAL
WITH PREJUDICE

Come now the parties in the above styled cause, by their
respective Attorneys of Record, and do hereby stipulate and agree
that this action may be dismissed by the Court with prejudice with
the cost taxed to the Defendant.

WITNESS our hands this 10th day of January, 1974.


J. Connor Owens, Jr.
Attorney for Plaintiff


Norborne C. Stone, Jr.
Attorney for Defendant

OF COUNSEL:

CHASON, STONE & CHASON
Attorneys at Law
Bay Minette, Alabama

FILED

JAN 10 1974

EUNICE B. BLACKMON CIRCUIT
CLERK

CHARLOTTE POPE, a minor,
by and through her next
friend and Mother, SARAH
R. HARRIS,

Plaintiff,

vs.

VIRGINIA K. DUDDY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,507

ORDER OF DISMISSAL WITH PREJUDICE

The parties to this cause having stipulated that the
same be dismissed with prejudice and the Court having considered
the same, it is, therefore,

ORDERED and DECREED by the Circuit Court of Baldwin
County, Alabama, that this cause be, and the same is hereby, dis-
missed with prejudice and the Defendant is taxed with the cost.

Done this 18th day of January, 1974.

Jefair M. Madbury
Circuit Judge

FILED

JAN 10 1974

EUNICE B. BLACKMON CIRCUIT
CLERK

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