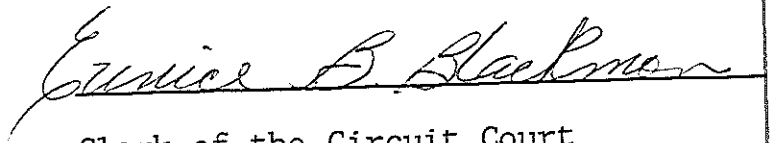


STATE OF ALABAMA Ø
 *
BALDWIN COUNTY Ø

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon VIRGINIA DUDDY to appear within thirty days from the service of this writ in the Circuit Court of said county at the place of holding same, then and there to answer the complaint of SARAH REBECCA HARRIS.

WITNESS my hand this 26th day of July, 1972.


Clerk of the Circuit Court

SARAH REBECCA HARRIS,

Plaintiff,

VS.

VIRGINIA DUDDY,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,519

COMPLAINT

The plaintiff claims of the defendant TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) as damages for that on, to-wit, July 27, 1971, the defendant negligently drove an automobile into an automobile in which the plaintiff was riding as a passenger on United States Highway 98 near Daphne in Baldwin County, Alabama, and as a proximate result of the said negligence on the part of the defendant, the plaintiff was seriously and permanently injured and caused to suffer great pain, to lose time from her work, and to incur large expense by way of doctor bills and medicine, all to her damage as aforesaid.

LLOYD AND DINNING
Demopolis, Alabama

By

Hugh A. Lloyd (TS)

J. C. Camp
J. C. Camp (TS)
Linden, Alabama

J. B. Blackburn
J. B. Blackburn
Attorneys for Plaintiff

Plaintiff demands a trial of said cause by jury.

FILED

JUL 28 1972

J. B. Blackburn

Of Counsel for Plaintiff

EUNICE B. BLACKMON CIRCUIT CLERK

Deft To Be Served: Bon Secour Area

Received 28 day of August 1972
and on 13 day of Sept 1972
I served a copy of the within 8 & C
on Virginia Duddy

By service on _____

TAYLOR WILKINS Sheriff

J. B. Blackburn D.S.

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 1 PROCESS[ES] AND
TRAVEL EXPENSE ON EACH OF \$ 922
PROCESS[ES] OR A TOTAL OF \$ 871

Case # 10,509

B-8

SARAH REBECCA HARRIS

VS:

VIRGINIA DUDDY

Deft. Address: Bon Secour Area

RECEIVED

AUG 28 1972

TAYLOR WILKINS

J. B. Blackburn

J. B. BLACKBURN
ATTORNEY AT LAW
110 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA 36507

July 26, 1972

P. O. DRAWER 59
TEL. 937-2061
AREA CODE 205

*Hold in file
until notified of address*

Mrs. Eunice Blackmon
Circuit Clerk
Bay Minette, Alabama

Dear Mrs. Blackmon:

I hand you herewith the original and a copy of a complaint in the case of Sarah Rebecca Harris, plaintiff, vs. Virginia Duddy, defendant.

Please file and docket this case.

At this time I am unable to give you an address of the defendant, but this information will be furnished to you so that the defendant may be served as soon as possible.

Very truly yours,

J. B. Blackburn
J. B. BLACKBURN

JBB:mlb

CC: Mr. Hugh A. Lloyd
CC: Mr. J. C. Camp

SARAH REBECCA HARRIS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
VIRGINIA DUDDY,	X	AT LAW NO. 10,509
Defendant.	X	

DEMURRER

Comes now the Defendant in the above styled cause, by and through her attorneys, and demurs to the Complaint filed in the above styled cause and to each and every count thereof, separately and severally, and assigns the following grounds, separately and severally, viz:

1. That said Complaint does not state a cause of action.
2. For that the allegation that the Plaintiff was riding as a passenger on United States Highway 98 near Daphne, in Baldwin County, does not allege with sufficient certainty the place where the accident alleged in the Complaint occurred.
3. For that the injuries to the said Plaintiff are not sufficiently alleged.

CHASON, STONE & CHASON

By: Charles C. Partin
Charles C. Partin

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon and mailed for all parties to this court case, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 19th day of September, 1972.

Charles C. Partin

FILED

SEP 19 1972

EUNICE B. BLACKMON CIRCUIT CLERK