

C. I. MILLER

PLAINTIFF

VS

AUTREY L. SHERRER

DEFENDANT

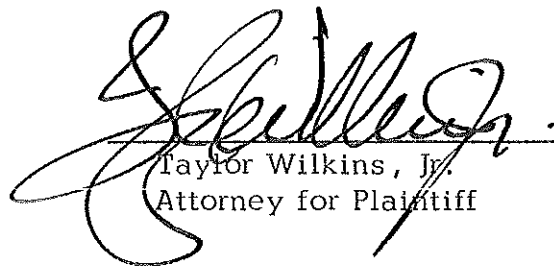
X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X AT LAW

X

X CASE NO: 10,617

COUNT I.

Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 (\$750.00) DOLLARS as damages for that heretofore and on, to-wit, November 14, 1971, the Defendant, Aubrey L. Sherrer, so negligently operated an automobile on U. S. Highway No. 31, at a point approximately, to-wit, one-quarter of a mile Northeast of the intersection of Highway No. 31 and Alabama State Highway No. 59, both public roads within the County of Baldwin, State of Alabama, that the said automobile was run into, upon or against the automobile of the Plaintiff, which was being operated at said time and said place, by William David Miller, and as a proximate result of the negligence of the Defendant, as aforesaid, Plaintiff's automobile was damages and demolished, rendering the same less valuable, all to the loss of the Plaintiff; hence this suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

FILED

SEP 22 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

C. I. MILLER,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
AUTREY L. SHERRER,	X	AT LAW NO. 10,617
Defendant.	X	

PLEA

Comes now the Defendant in the above styled cause, by and through his Attorneys of record, and for plea to the Complaint heretofore filed against him in said cause says, separately and severally, as follows:

1. Not guilty.

2. For that the Plaintiff, at the time and place alleged in the Complaint was guilty of negligence in and about the operation of his said motor vehicle, which said negligence proximately contributed to the accident and injuries alleged by the Plaintiff, hence he should not recover.

3. Comes now the Defendant in the above styled cause and by way of recoupment pleads separately and severally as follows:

The Defendant claims of the Plaintiff the sum of \$350.00 as damages for that heretofore on to-wit the 14th day of November, 1971 the Plaintiff, C. I. Miller, so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Defendant and as a direct and proximate result of such negligence of the Plaintiff the Defendant's vehicle was damaged in that its right front fender, headlights and right front wheel and its radiator were bent, damaged or broken and its frame was bent and the market value of the automobile was permanently depreciated, all to the damage of the

Defendant in the sum above mentioned, hence this claim.

CHASON, STONE & CHASON

BY: John E. Chason
Attorneys for Defendant

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OCT 30 1972

EUNICE B. BLACKMON CIRCUIT
CLERK