

STATE OF ALABAMA

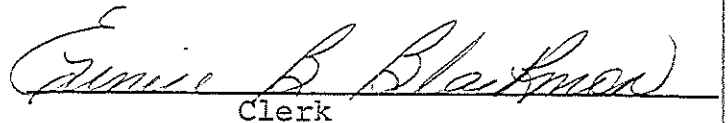
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William Valree 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 Betty Driver, as Administratrix of the Estate of Henry Horace Kitchens, Deceased.

Witness my hand this 19 day of October, 1972.


Clerk

BETTY DRIVER, as Administra- X
trix of the Estate of HENRY
HORACE KITCHENS, Deceased, X

Plaintiff, X

IN THE CIRCUIT COURT OF

vs. X

BALDWIN COUNTY, ALABAMA

WILLIAM VALREE, X

Defendant. X

AT LAW

10,463

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Seventy-five Thousand Dollars (\$75,000.00) as damages for that heretofore, on, to-wit: the 28th day of September, 1972, at a point on Alabama Highway No. 42 at its intersection with Daphne Avenue in the City of Daphne, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into or against a motor vehicle being operated at said time and place by the Plaintiff's intestate and as a direct and proximate

result of such negligence, the Plaintiff's intestate was injured so seriously as to cause his death, for which the Plaintiff claims damages as aforesaid.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Seventy-five Thousand Dollars (\$75,000.00), as damages for that heretofore on, to-wit: the 28th day of September, 1972, at a point on Alabama Highway No. 42 at its intersection with Daphne Avenue in the City of Daphne, Baldwin County, Alabama, the Defendant, at said time and place, so wilfully or wantonly operated a motor vehicle as to wilfully or wantonly cause or allow the same to collide with a motor vehicle being then and there operated by the Plaintiff's intestate thereby wilfully or wantonly causing the death of the Plaintiff's intestate, for which the Plaintiff claims damages as aforesaid.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

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

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

FILED

OCT 18 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

10, 443

(B.18)

BETTY DRIVER, as Administratrix
of the Estate of HENRY HORACE
KITCHENS, Deceased,

Plaintiff,

VS.

WILLIAM VALREE,
DAPHNE, AL.

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

FILED
AT LAW

OCT 19 1972
EUNICE B. REAGAN AND COMPLAINT
SUMMONS

RECEIVED
CIRCUIT CLERK

OCT 18 1972

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

55
Ten Cents per mile 5.50
TAYLOR
BY Johnson
DEPUTY CLERK

Received 19 day of Oct 72
and on 25 day of Oct 72
I served a copy of the within
on William Valree
By service on William Valrie
Taylor Wilkins
TAYLOR WILKINS, Sheriff
By Donald P. Johnson D. S.
Serve Montrose

BETTY DRIVER, as Administratrix of the)	IN THE CIRCUIT COURT
Estate of HENRY HORACE KITCHENS,)	OF BALDWIN COUNTY,
Deceased,)	ALABAMA
Plaintiff,)	AT LAW
vs.)	
WILLIAM VALRIE,)	
Defendant.)	CASE NO. 10,663
)	

ANSWER

Comes now the Defendant William Valrie and for answer to the Plaintiff's complaint assigns the following pleas, separately and severally, as follows:

1. Not guilty.
2. For that at the time and place complained of and on the occasion complained of the Plaintiff's intestate was himself so guilty of negligence in and about the operation of his motor vehicle which proximately caused or contributed to his alleged injuries and death at said time and place wherefore, Plaintiff should have and recover nothing from this Defendant.

BROWN, HUDGENS, FULFORDM
SINTZ AND RICHARDSON

BY: _____

PETER V. SINTZ

FILED

NOV 7 1972

EUNICE B. BLACKMON CIRCUIT CLERK

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 6th day of Nov, 1972 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.

Peter V. Sintz