

MOLLIE COHEN,

Plaintiff,

vs.

CHARLES N. HARRIS and
ELIZABETH K. HARRIS,

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Come the Defendants in the above styled cause and demur to Counts One and Two of the Complaint filed in said cause separately and severally and assign the following separate and several grounds, viz:

1. That said Count does not state a cause of action.
2. That Count One of said Complaint does not allege that Elizabeth K. Harris was the agent, servant or employee of the Defendant, Charles N. Harris, at the time of the accident.
3. That the allegation in Count One of the Complaint that Elizabeth K. Harris, the agent, servant or employee of the Defendant, Charles N. Harris, who was then and there acting within the line and scope of her employment does not allege that she was acting within the line and scope of her employment as such agent, servant or employee.
4. That said Count does not allege any duty owing by the Defendants to the Plaintiff.
5. That said Count does not sufficiently set out the injuries the Plaintiff received.

FILED

June 8, 1954

ALICE J. DUCK, Clerk

Harold V. Jones
Attorneys for Defendants.

2277

DEMURRER

MOLLIE COHEN,

Plaintiff,

vs.

CHARLES N. HARRIS and ELIZABETH
K. HARRIS,

Defendants.

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

Filed this 8th day of June, 1954.

Alice J. Duck
Clerk.

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CHARLES N. HARRIS and ELIZABETH K. HARRIS to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of MOLLIE COHEN.

WITNESS my hand this 25th day of May, 1954.

Alice J. Duck
Clerk of the Circuit Court.

Defendants reside at 1008
Marine Street, Mobile, Alabama.

FILED

May 25, 1954
ALICE J. DUCK, Clerk

MOLLIE COHEN,

Plaintiff,

VS.

CHARLES N. HARRIS and
ELIZABETH K. HARRIS,

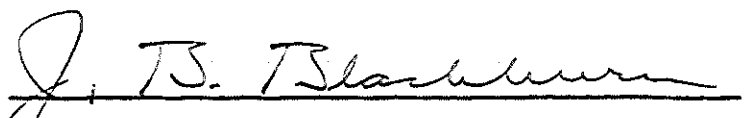
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAWCOUNT ONE

The plaintiff claims of the defendants Ten Thousand Dollars (\$10,000) for that on, to-wit, June 5, 1953, the defendant, Elizabeth K. Harris, the agent, servant or employee of the defendant, Charles N. Harris, who was then and there acting within the line and scope of her employment, negligently drove an automobile into an automobile in which the plaintiff was riding at a point on Alabama Highway 3, a public highway in Baldwin County, Alabama, at a point approximately three-fourths of a mile South of the Town of Robertsdale, Alabama, and as a proximate result of the said negligence on the part of the said defendants, the plaintiff was seriously and permanently injured, caused to suffer great pain and damage, to sustain permanent injuries to one of her knees, that she incurred large expenses by way of doctor bills and medicine, all to her damage as aforesaid.

COUNT TWO

The plaintiff claims of the defendant, Elizabeth K. Harris, Ten Thousand Dollars (\$10,000) as damages for that on, to-wit, June 5, 1953, the defendant negligently drove an automobile into an automobile in which the plaintiff was riding at a point on Alabama Highway 3, a public highway in Baldwin County, Alabama, at a point approximately three-fourths of a mile South of the Town of Robertsdale, Alabama, and as a proximate result of the said negligence on the part of the said defendant, the plaintiff was seriously and permanently injured, caused to suffer great pain and damage, to sustain permanent injuries to one of her knees, that she incurred large expenses by way of doctor bills and medicine, all to her damage as aforesaid.



Attorney for plaintiff.

Plaintiff demands a trial of the said cause by jury.

J. B. Blackburn

Attorney for plaintiff.

The plaintiff in this cause being a non-resident of the State of Alabama, I hereby acknowledge myself as security for the court costs of this proceeding.

J. B. Blackburn

FILED
May 25, 1954
ALICE J. DUCK, Clerk

Defendants reside at 1008 Marine Street,
Mobile, Alabama

EXECUTED
This 27 day of May, 1954
by serving a copy of the within on
Chas H. Davis
W. H. HOLCOMBE, Sheriff
By R. J. Matthews D. S.

EXECUTED
This 27 day of May, 1954
by serving a copy of the within on
Elizabeth K. Davis
W. H. HOLCOMBE, Sheriff
By R. J. Matthews D. S.

no 2.2.77
493 SUMMONS AND COMPLAINT
MOLLIE COHEN, 464
VS. Plaintiff,
CHARLES N. HARRIS and
ELIZABETH K. HARRIS,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
MAY 25 1954
J. B. BLACKBURN, Clerk
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

2277

Bay Minette, Ala.,

May 25, 1954

To the Sheriff of

Mobile County,

Alabama.

I enclose herewith

see for Charles J. Harris
Elizabeth E. Harris - 1008 Marine St.
Mobile

Please serve and return as early as possible.

Mykes L. L. L.
Sheriff Baldwin County Alabama.

(If not found in your county please advise promptly giving information as to present location if possible)