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ELIZABETH GUTHRIE)
PLAINTIFF)

VS.)

ARTHUR W. CORSON)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2554

Comes the plaintiff and amends her bill of complaint
as follows:

Count One

The plaintiff claims of the defendant \$3500.00 as damages for that heretofore to-wit: August 27th, 1954, the plaintiff was riding in an automobile on State public highway number 89 in Baldwin County, Alabama, at or near the intersection with the Bon Secour Foley, Farm to Market Road where she had a right to be, when the defendant negligently ran an automobile into, upon or against the automobile in which the plaintiff was riding, and by reason of such negligence and as a proximate result and consequence thereof the plaintiff was severely injured in this to-wit: she was made sick, sore and lame; she suffered multiple contusions of the chest, arms, body and legs; she suffered acute shock; she suffered and continues to suffer great physical pain; she suffered and continues to suffer great mental ~~xxx~~ anguish; she was internally injured and she was permanently ~~xxxxxxxxxxxx~~ injured, for all of which she claims damages, hence this suit.

Count Two.

The plaintiff claims of the defendant the further sum of \$3500.00 as damages for that heretofore on to-wit: the 27th day of August, 1954, the plaintiff was lawfully riding in an automobile on State Highway 89 in Baldwin County, Alabama being a public highway, at or near the intersection with the Bon Secour Foley Farm to Market Road, at which time and place the defendant ~~willfully and wantonly~~ willfully and wantonly injured the plaintiff by willfully and wantonly driving an automobile into upon or against the automobile in which the plaintiff was riding, and by reason thereof and as a proximate result and consequence of said willful and wanton acts the plaintiff suffered severe personal injuries in this to-wit: she was made sick, sore and lame; she suffered multiple contusions of the chest, arms, body and legs; she suffered acute shock; she suffered and continued to suffer for a long period of time great mental anguish; she suffered and continued to suffer for a long period of time great physical pain and she continues to suffer great pain; she was internally injured and she was permanently injured, for all of which she claims damages, as aforesaid, hence this suit.


Attorney for Plaintiff

ELIZABETH GUTHRIE,

Plaintiff,

vs.

ARTHUR W. CORSON,

Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2554

Comes now the Defendant in the above styled cause and demurs to the Amended Complaint heretofore filed in said cause and to each and every count thereof separately and severally and assigns the following separate and several grounds:

1. The amended complaint fails to state a cause of action.
2. The allegations of the complaint are vague, indefinite and uncertain.
3. Count Two fails to state a cause of action.
4. Count Two fails to allege that the Defendant willfully or wantonly injured the Plaintiff.

Respectfully submitted,

CHASON & STONE

By: M. Chason & S. Stone
Attorneys for Defendant.

RECORDED

ELIZABETH GUTHRIE,
Plaintiff,

vs.

ARTHUR W. CORSON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2554

DEMURRER

FILED

JUN 14 1955

ALICE L. BUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

AMMEDED COMPLAINT

ELIZABETH GUTHRIE)
Plaintiff)

VS.)

ARTHUR W. CORSON)
Defendant)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

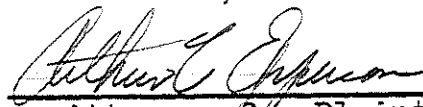
Comes the plaintiff and amends her bill of complaint as follows:

COUNT ONE

The plaintiff claims of the defendant \$3500.00 as damages for that heretofore on the 27th day of August, 1954 the plaintiff was driving an automobile on State public highway number 89 at or near the intersection with the Bon Secour-Foley Farm to Market road where she had a right to be, when the defendant negligently ran an automobile into upon or against the automobile in which the plaintiff was riding, and by reason thereof and as a proximate result and consequence thereof the plaintiff was severely injured in this to-wit: she was made sick sore and lame; she suffered multiple contusions of the chest, arms, body and legs; she suffered acute shock; she suffered and continued to suffer for a long period of time great mental anguish; she suffered and continued to suffer for a long period of time great physical pain; she was internally injured and permanently injured, for all of which she claims damages as aforesaid hence this suit.

COUNT TWO

The plaintiff claims of the defendant the further sum of \$3500.00 as damages for that heretofore on the 27th day of August, 1954, the plaintiff was lawfully driving an automobile on State highway number 89, being a State and public highway, at or near the intersection with the Bon Secour-Foley Farm to Market road in Baldwin County, Alabama, at which time and place the defendant willfully or wantonly ran an automobile into, upon or against the automobile in which the plaintiff was riding, and by reason thereof, and as a proximate result and consequence thereof, the plaintiff was injured and received personal injuries in this to-wit: she was made sick, sore and lame; she suffered multiple contusions of the chest, arms, body and legs; she suffered acute shock; she suffered and continued to suffer for a long period of time great mental anguish; she suffered and continued to suffer for a long period of time great physical pain; she was internally injured for all of which she claims damages as aforesaid, hence this suit.


Attorney for Plaintiff

ELIZABETH GUTHRIE,
Plaintiff,
vs.
ARTHUR W. CORSON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2554

Comes now the Defendant, by his attorneys, and demurs to the Complaint heretofore filed against him and to each Count thereof separately and severally and assigns the following separate and several grounds in support thereof:

1. The Complaint fails to state a cause of action.
2. The allegations of said Complaint are vague, indefinite and uncertain.
3. The place of the alleged accident is not shown with sufficient certainty.
4. Count Two of the Complaint fails to state a cause of action.
5. Count Two of the Complaint fails to allege that the Defendant willfully and wantonly drove his automobile at the time and place complained of.

Respectfully submitted,

CHASON & STONE

By:


Attorneys for Defendant.

2554
RECORDED

ELIZABETH GUTHRIE,

Plaintiff,

vs.

ARTHUR W. CORSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2554

DEMURRER

FILED

APR 1 1955

ALICE I. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

SUMMONS

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

YOU are hereby commanded to summon Arthur W. Corson, 248-98-00 Barin Field, Alabama, to appear and plead, answer or demur within thirty days from service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, Alabama, against Arthur W. Corson by Elizabeth Guthrie.

Witness my hand this 30 day of March, 1955.

Deice J. Hensley
Clerk

COMPLAINT

ELIZABETH GUTHRIE)
Plaintiff)

VS)

ARTHUR W. CORSON)
Defendant)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The plaintiff claims of the defendant \$3500.00 as damages for that heretofore on the 27 th day of August, 1954 the plaintiff was driving an automobile on Highway number 89 at or near the intersection with the Bon Secour-Foley Farm to Market road, which roads are public roads, where she had a right to be, when the defendant negligently ran an automobile into, upon or against the automobile in which the plaintiff was riding, and by reason thereof and as a proximate result and consequence thereof the plaintiff was severely injured in this to-wit: her chest was crushed; she was made sick, sore and lame, she suffered multiple contusions of the chest, arms, body and legs; she suffered acute shock; she suffered and continuous to suffer great great mental anguish and physical pain, for all of which she claims damages as aforesaid, hence this suit.

COUNT TWO

The plaintiff claims of the defendant the sum of \$3500.00 as damages for that heretofore on the 27 th day of August, 1954, the plaintiff was lawfully operating an automobile on highway number 89, being a State and public highway, at or near its intersection with the Bon-Secour Foley Farm to Market road in Baldwin County, Alabama, at which time and place the defendant wilfully and wantonly injured the plaintiff by running and automobile into, upon or agianst the automobile in which the plaintiff was riding, and by reason thereof, and as a proximate result and consequence thereof, the plaintiff was injured and received persoaal injuries in this to-wit; her chest was crushed; she was made sick sore and lame; she suffered multiple contusions of the chest, arms, body and legs; she suffered acute shock; she suffered and continues to suffer great mental anguish and physical pain; she had to spend much time in the hospital, for all of which she claims damages as aforesaid, hence this suit.

The Plaintiff Demands a
trial by jury.

Arthur C. Epperson
Attorney for Plaintiff

Arthur C. Epperson
Attorney for the Plaitiff