

ANNIE LOUIS DAVIS,

PLAINTIFF

VS

HERTIS DOYLE BAGGETT,

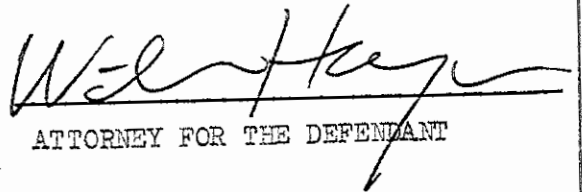
DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

PLEA

1. The Defendant pleads not guilty.

  
ATTORNEY FOR THE DEFENDANT

ANNIE LOUISE DAVIS,  
                    plaintiff,  
  
                    vs  
  
HERTIS DOYLE BAGGETT,  
  
                    Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
AT LAW  
  
# 2591

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Comes now the Defendant in the above styled cause and demurs to the complaint of the Plaintiff heretofore filed in this cause and to each count, allegation, averment, sentence and paragraph, seperately and severally, and assigns, seperately and severally, the following grounds, to-wit:

1. For that the complaint does not state a cause of action.
2. The complaint is vague, indefinite and uncertain.
3. The complaint does not state wherein defendant was negligent.
4. The complaint does not allege any negligence on the part of

the Plaintiff.

*W. H. Hays*  
Attorney for ~~Plaintiff~~  
                    *Defendant*

ANNIE LOUISE DAVIS,

PLAINTIFF,

VS

HERTIS DOYLE BAGGETT,

DEFENDANT.

# 2591

DEMMURER

FILED  
MAY 12 1955  
ALICE J. BUCK, Clerk

CIVIL SUBPOENA — ORIGINAL — In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred.

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Case No. 2591 March TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

You Are Hereby Commanded to Summon

Dr. Alfred R. East - 803 Government  
St; Mobile, Ala.

if to be found in your County, at the instance of the

Self.

to be and appear before the Honorable, the Judge of the Circuit Court of Baldwin County, at the Court House

thereof, by 9:00 o'clock of the forenoon, on the 14<sup>th</sup> day of March, 1956, and from

day to day and term to term of said Court until discharged by law, then and there to testify, and the truth

to say, in a certain cause pending, wherein Annie Louise Davis, Plaintiff and Hertis Doyle

Beggett, Defendant.

Herein Fail Not, and have you then and there this Writ.

Given under my hand and seal, this 27 day of Feb., 1956.

Olivia J. Smith Clerk.

Received in office this 27 day of

Feb, 1956

SHERIFF

I have executed this writ:

this 29th day of Feb-  
ruary, 1956, by serving  
a copy of the within  
Civil Subpoena on Mr.  
Alfred R. Carl.

Ray D. Bridges

SHERIFF

A. D. Chatham, D. S.

ORIGINAL

No 2591

Page

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Annie Louise Davis

Plaintiff

Vs.

Hertie Doyle Buggitt

Defendant

CIVIL SUBPOENA

Issued this 27 day of

February, 1956

Alice J. Duck

Dr Clerk

CIVIL SUBPOENA — ORIGINAL — In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred.

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Case No. 2591 March TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

You Are Hereby Commanded to Summon Kenneth Cooper

if to be found in your County, at the instance of the Plf.  
to be and appear before the Honorable, the Judge of the Circuit Court of Baldwin County, at the Court House  
thereof, by 9:00 o'clock of the forenoon, on the 14<sup>th</sup> day of March, 1956, and from  
day to day and term to term of said Court until discharged by law, then and there to testify, and the truth  
to say, in a certain cause pending, wherein A. L. Davis, Plaintiff and H. D.  
Saggett, Defendant.

Herein Fail Not, and have you then and there this Writ.

Given under my hand and seal, this 7<sup>th</sup> day of March, 1956.

Alice J. Smith Clerk.

ORIGINAL

Page

No. 2591

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

A. J. Allen

Plaintiff

Vs.

W. D. Buggitt

Defendant

CIVIL SUBPOENA

Issued this 7 day of

March, 1956

Clerk

Alice J. Smith

Received in office this 7 day of

March, 1956

SHERIFF

I have executed this writ: 3/7/56

W. D. Buggitt

SHERIFF

W. D. Buggitt

W. D. Buggitt

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Hertis Doyle Baggett 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 Annie Louise Davis.

Witness my hand this 25 day of April, 1955.

Annie Louise Davis  
Clerk.

ANNIE LOUISE DAVIS,

Plaintiff,

vs.

HERTIS DOYLE BAGGETT,

Defendant.

I  
I  
I  
I  
I  
I  
I

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

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on, to-wit, April 16, 1955, the Defendant, Hertis Doyle Baggett, so negligently operated a motor vehicle on U. S. Highway #31, a public highway, at a point approximately 7.5 miles Southwest of the Courthouse in Bay Minette, Alabama, in Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, over or against an automobile in which the Plaintiff was riding and which was then and there being driven along said highway, where she had a right to be, and as a proximate result of such negligence Plaintiff was injured in this: her left leg was injured just below the knee, her left leg was bruised below her hip, her right leg was injured just below her knee, she received a severe blow on her forehead and on the top of her head and her neck and back were seriously injured and she was bruised and made sore all over her body and she was caused to suffer hospital



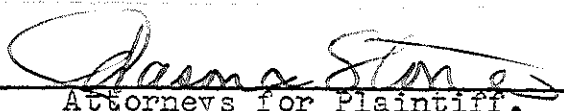
and medical expenses which included doctors bills and X-rays and she was caused to suffer great physical and mental pain and anguish, all to the damage of the Plaintiff, aforesaid, wherefore Plaintiff brings this suit and asks judgment in the above amount.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on, to-wit, April 16, 1955, the Defendant, Hertis Doyle Baggett, willfully and wantonly injured the Plaintiff on U. S. Highway #31, a public highway, at a point approximately 7.5 miles Southwest of the Courthouse in Bay Minette, Alabama, Baldwin County, Alabama, by then and there driving a motor vehicle into, over or against an automobile in which the Plaintiff was then and there riding and which was being driven along said highway, where she had a right to be and as a proximate result thereof Plaintiff was injured in this: her left leg was injured just below the knee, her left leg was bruised below her hip, her right leg was injured just below her knee, she received a severe blow on her forehead and on the top of her head and her neck and back were seriously injured and she was bruised and made sore all over her body and she was caused to suffer hospital and medical expenses which included doctors bills and X-rays and she was caused to suffer great physical and mental pain and anguish, all to the damage of the Plaintiff, aforesaid, wherefore Plaintiff brings this suit and asks judgment in the above amount.

  
Attorneys for Plaintiff.

Plaintiff demands a trial of this cause by a jury.

  
Attorneys for Plaintiff.

*Jury*  
702591

Received 25 day of April 1955  
and on 28 day of Apr. 1955  
served a copy of the within O.C.

service on Martin Doyle Baggett

TAYLOR WILKINS, Sheriff  
By W. H. Stone D. S.

SUMMONS AND COMPLAINT

ANNIE LOUISE DAVIS,  
Plaintiff,  
vs.  
HEETIS DOYLE BAGGETT,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

Filed this 25 day of April, 1955.

Arice J. Duck  
Clerk.

LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA