

2639

MRS. TENNYSON R. ASH

PLAINTIFF

VS

JAMES HUBERT GORAM

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant in the above styled cause acting by and through his attorneys of record, Wilters & Brantley, and shows unto this Court as follows:

That the Defendant, James Hubert Goram, is now in military service of the United States of America and therefore unable to properly defend this cause of action.

Wherefore the Defendant prays that this cause of action will be continued until the said James Hubert Goram is released from the military service of the United States.

Wilters & Brantley

BY:

John M. Brantley
Attorneys for the Defendant

MRS TINKYSON R. ASH

PLAINTIFF

VS

JAMES ROBERT CORAM

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant in the above styled cause and for answer to the
Plaintiff's Complaint says:

1.

Not guilty.

Winters & Brantley

BY:

William M Brantley
Attorneys for the Defendant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 2639

June

TERM, 19 55.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES HUBERT GORAM

Billips Service Station.

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

JAMES HUBERT GORAM

, Defendant

by MRS. TENNYSON R. ASH

, Plaintiff

Witness my hand this 17th. day of June 19 55.

Deirdre - [Signature], Clerk

MRS. TENNYSON R. ASH

PLAINTIFF

VS

JAMES ROBERT GORAM

DEFENDANT

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

~~Comes now the Defendant in the above styled cause and says that this~~
cause should be abated and for grounds therefor says as follows:

1.

That it is shown upon the face of the complaint that the accident on which the suit was based occurred more than one year prior to the time of the filing of this suit, hence it is barred by the statutes of limitations.

Wilters & Brantley

BY: J. Oliver M. Brantley
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY: J. Oliver M. Brantley
Attorneys for the Defendant