

HAND, ARENDALL & BEDSOLE  
LAWYERS

SUITE 622 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
J. JEPHTHA HILL  
ALEXANDER F. LANKFORD  
EDMUND R. CANNON, JR.

MAILING ADDRESS

P. O. BOX 123  
MOBILE, ALA.

CABLE ADDRESS:  
HAB

June 15, 1956

Miss Alice J. Duck, Clerk,  
Circuit Court of Baldwin County,  
Bay Minette, Alabama.

Re: Robert M. Cairns v.  
Walter R. Nelson,  
Case No. 2873

Dear Miss Duck:

I understand that argument on the demurrers which have been filed in the above case is set for the third Tuesday in June. I should appreciate your making a notation on the docket sheet or otherwise informing the judge that Mr. Edwards and I wish to submit without argument.

Yours very truly,

*Paul W. Brock*  
for HAND, ARENDALL & BEDSOLE

PWB:rb

CC: W. Jack Edwards, Esquire,  
First National Bank Building,  
Mobile, Alabama.

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March 2, 1956

Clerk, Circuit Court of Baldwin County  
Bay Minette, Alabama

Re: Robert M. Cairns v.  
Walter R. Nelson

Dear Sir:

Enclosed are the original and first copy of  
a complaint, which I would appreciate your having  
the sheriff of your county serve upon the defendant.

Thanking you for your help,

Yours very truly,

*Paul W. Brock*  
for HAND, ARENDALL & BEDSOLE

PWB:rb

Encl. 2

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Dear Sir:

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Thanking you for your help,

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*Paul W. Brock*  
for HAND, ARENDALL & BEDSOLE

PWB:rb

Encl. 2

ROBERT M. CAIRNS,  
Plaintiff,

v.

WALTER R. NELSON,  
Defendant.

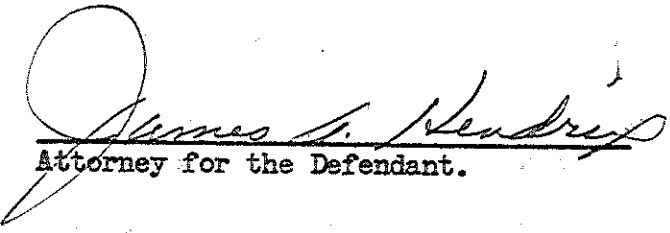
( IN THE CIRCUIT COURT OF  
( BALDWIN COUNTY, ALABAMA  
( AT LAW  
( CASE NO. 2873  
(

DEMURERS

Comes now the defendant in the above styled cause and demurs to the complaint, and separately and severally to each count thereof, and for grounds of demurer, assigns, separately and severally the following;

1. It is not alleged with sufficient certainty what portions or part of the automobile were damaged.

2. It is not alleged that the plaintiff used this automobile in the operation of his business.

  
Attorney for the Defendant.

ROBERT M. CAIRNS,  
Plaintiff,

v.

WALTER R. NELSON,  
Defendant.

:  
: IN THE CIRCUIT COURT OF  
:  
: BALDWIN COUNTY, ALABAMA  
:  
: AT LAW  
:  
: CASE NO. 2873  
:

COUNT ONE

Plaintiff claims of the defendant the sum of One Thousand Five Hundred and No/100 Dollars (\$1,500.00) for that on, to-wit, July 2, 1955, the defendant did so negligently drive an automobile while upon a public highway, to-wit, U. S. Highway 90, at a point near Loxley, Alabama, in Baldwin County, Alabama, that said automobile was caused to collide with the automobile belonging to the plaintiff, which was then and there being driven upon said U. S. Highway 90, and as the proximate result and consequence of said negligence of said defendant, the automobile of the plaintiff was battered, bent, broken and otherwise damaged, and the plaintiff lost the use thereof for a period of time, hence this suit.

COUNT TWO

Plaintiff claims of the defendant the sum of One Thousand Five Hundred and No/100 Dollars (\$1,500.00) for that on, to-wit, the 2d day of July, 1955, the automobile of the plaintiff was being driven upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway 90, at or near the town of Loxley, Alabama, and that then and there the defendant did wantonly damage the automobile of the plaintiff by wantonly driving an automobile into said automobile of the plaintiff, and that, as the proximate result and consequence of said wanton misconduct, the automobile of the plaintiff was damaged by being battered, bent and broken, and the plaintiff lost the use thereof for a period of time, hence this suit.

HAND, ARENDALL & BEDSOLE

BY: Paul A. Brock  
Attorneys for the Plaintiff

Please forward summons and complaint to the Sheriff of Baldwin County, Alabama for service upon the defendant, Walter R. Nelson, Robertsdale, Alabama.

SPRINKLE & EDWARDS

BY: W. Jack Edwards  
Attorneys for the Plaintiff

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2873

March TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

WALTER R. NELSON

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

WALTER R. NELSON

, Defendant

by

ROBERT M. CAIRNS

, Plaintiff

Witness my hand this 5 6th. day of March 19 56

*Alice J. Huck*

, Clerk

No. 2873

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THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

ROBERT M. CAIRNS

Plaintiffs

vs.

WALTER R. NELSON

Defendants

SUMMONS and COMPLAINT

Filed March 6, 19 56

Alice J. Duck

Clerk

PAUL A. BROCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Mar 6, 19 56

Taylor Wilkins Sheriff

I have executed this summons

this 4 - April, 19 56  
by leaving a copy with

Walter R. Nelson

Sheriff claims 50 miles at

Ten Cents per mile Total \$5.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Edleigh Steadham Deputy Sheriff

Robert Lake