

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons RENE STEVEN WOGAN 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 the same, then and there to answer the complaint of ROY FREEMAN.

Witness my hand this the 30 day of August, 1956.

Archie J. Duck  
Clerk

ROY FREEMAN  
Plaintiff

vs.

RENE STEVEN WOGAN  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO.

3021

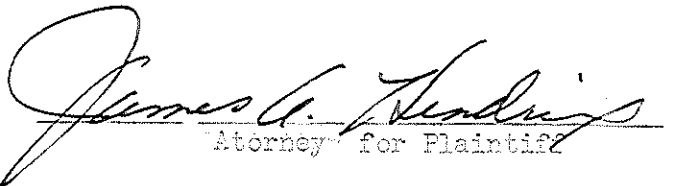
COUNT ONE

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$750.00) as damages for that heretofore on, to-wit; June 24, 1956, the Plaintiff's automobile was being operated along and upon a public highway in Baldwin County, Alabama, to-wit, U. S. Highway No. 90 at a point about seven miles West of the town of Loxley, Alabama near U. S. Highway No. 90 Truck Route, and that then and there the Defendant negligently drove an automobile into or against the automobile belonging to the Plaintiff, causing great damage and injuries to the Plaintiff's automobile; the left rear door was broken and bent; the left rear fender was broken; the rear bumper was broken; the left rear wheel was broken and bent; the left rear tail light and assembly was broken and bent; the rear glasses were broken, all to the damage of the Plaintiff as aforesaid. The Plaintiff avers that all of his damages as aforesaid were proximately caused by the negligence of the Defendant; wherefore he sues.

COUNT TWO

The Plaintiff claims of the Defendant, the sum of SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$750.00) AS damages for that on to-wit; June 24, 1956, at approximately 5:30 P. M., Janet Nixon Freeman was driving an automobile belonging to the Plaintiff along and upon a public Highway in Baldwin County, Alabama, to-wit: U. S. Highway No. 90 at a point about seven miles West of the town of Loxley,

Alabama, near U. S. Highway No. 90 Truck Route, and that then and there the Defendant negligently drove an automobile into or against the automobile belonging to the Plaintiff, causing great damage and injuries to the Plaintiff's automobile; the left rear door was broken and bent; the left rear fender was broken; the rear bumper was broken; the left rear wheel was broken and bent; the left rear tail light and assembly was broken and bent; the rear glasses were broken, all to the damage of the Plaintiff as aforesaid. The Plaintiff avers that all of his damages as aforesaid were proximately caused by the negligence of the Defendant; wherefore he sues.

  
Attorney for Plaintiff

1102

RECEIVED IN OFFICE  
SEP 5 1956  
M. S. BUTLER, Sheriff

The Sheriff claims.....<sup>2</sup>  
miles at 10c per mile for a total  
of \$.....<sup>20</sup>  
M. S. Butler, Sheriff  
Montgomery County, Ala.

EXECUTED BY SERVING <sup>3</sup>A  
COPY OF THE WITHIN

Mary Emma Hunt  
at large of  
Sept 5 1956

M. S. Butler  
Sheriff Montgomery County

By Thompson  
Deputy Sheriff

RECORDED

IN THE CIRCUIT COURT OF  
BALWIN COUNTY, ALABAMA

AT LAW

NO. 3021

ROY FREEMAN, Plaintiff

vs.

RENE STEVEN WOGAN, Defendant

SUMMONS AND COMPLAINT

FILED

AUG 30 1956

ALICE J. DUCK, Clerk

Defendant's Address:

36 Elliott Road  
Fort Walton Beach, Fla.

JAMES A. HENDRIX  
ATTORNEY AT LAW  
ROBERTSDALE, ALA.


ROY FREEMAN,  
Plaintiff,  
vs.  
RENE STEVEN WOGAN,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW. NO. 3021.

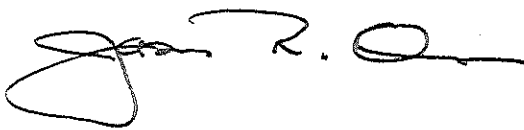
DEMURRER

Now comes the Defendant, by his Attorney, and demurs to the Complaint heretofore filed in this cause and to each count thereof, separately and severally, and as grounds for said demurrer assign the following separately and severally:

1. It does not state a cause of action.
2. The place where the alleged accident occurred is not stated with sufficient certainty.
3. The allegation that the Defendant negligently drove an automobile is a mere conclusion of the pleader.
4. For that it does not appear with sufficient certainty what duty, if any, Defendant may have owed to the Plaintiff.
5. For that it does not appear with sufficient certainty wherein Defendant violated any duty he may have owed to the Plaintiff.
6. No facts are alleged to show that the Plaintiff sustained any damage or injury as the proximate result of any negligence or breach of duty on the part of the Defendant.
7. For aught that appears, Plaintiff's automobile had no right to be where it was at the time and place of said accident.

  
Attorney for Defendant.

DEFENDANT DEMANDS A TRIAL  
BY JURY.



LYONS, PIPES & COOK  
ATTORNEYS AT LAW  
517 First National Bank Building  
MOBILE, ALABAMA

Joseph H. Lyons  
Sam W. Pipes, III  
Walter M. Cook

P. O. Box 265  
Telephone HE 24484

October 22, 1956

3021  
Miss Alice Duck,  
Clerk of the Court,  
Bay Minette, Ala.

Re: Case No. 3021  
Freeman vs Wogan

Dear Miss Duck:

Enclosed please find draft in the amount of \$14.00,  
in payment of Court Costs in connection with the above  
case. Please sign and return the enclosed letter to us,  
certifying that this case has been dismissed.

Yours truly,

LYONS, PIPES AND COOK

*Walter M. Cook*  
Walter M. Cook *a*

a  
encl

To Whom It May Concern:

Re: Case No. 3021,  
In the Circuit Court of Baldwin County, Ala.  
Roy Freeman, Plaintiff vs. Rene Steven Wogan,  
Defendant.

This will certify that this case has been dismissed and  
the Court Costs paid in full.

Yours truly,

Clerk of the Court

Alice Duck

ROY FREEMAN - Plaintiff

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA AT LAW

VS.

RENE STEVEN WOGAN - Defendant

CASE NO. 3021

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Mary Texas Hurt, Secretary of State, hereby certify that on September 5, 1956  
I sent by registered mail in an envelope addressed as follows:

" Rene Steven Wogan  
36 Elliott Road  
Fort Walton Beach, Florida"

"Registered Mail—  
Return Receipt Requested  
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

" Rene Steven Wogan  
36 Elliott Road  
Fort Walton Beach, Florida

You will take notice that on September 5, 1956 the Sheriff of  
Montgomery County, Alabama, served upon me, in my official capacity, Summons and  
Complaint in a case entitled: ROY FREEMAN, Plaintiff VS RENE STEVEN WOGAN,  
Defendant

SOUNTY  
in the CIRCUIT COURT OF BALDWIN/ ALABAMA AT LAW  
Case No. 3021 a true copy of which Summons and Complaint is attached hereto  
and the said service upon me as Secretary of State of the State of Alabama has the force  
and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 5  
day of September 1956.


Enclosure (1)

(Signed) Mary Texas Hurt  
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed  
as above set forth had attached to it a true copy of the Summons and Complaint in the above-  
styled cause.

I further certify that on September 10, 1956 I received the  
return card, showing receipt by the designated addressee of the aforementioned matter  
at Fort Walton Beach, Fla. on 9-7-56.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 10 day  
of September 1956.



Mary Texas Hurt  
Secretary of State

Enclosures: Return Receipt Card and  
copy of Summons and  
Complaint.

cc: Honorable James A. Hendrix  
Attorney at Law  
Robertsdale, Florida

STATE OF ALABAMA  
BALDWIN COUNTY

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Reice J. Duck  
Clerk

ROY FREEMAN  
Plaintiff

vs.

RENE STEVEN WOGAN  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

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Alabama, near U. S. Highway No. 90 Truck Route, and that then and there the Defendant negligently drove an automobile into or against the automobile belonging to the Plaintiff, causing great damage and injuries to the Plaintiff's automobile; the left rear door was broken and bent; the left rear fender was broken; the rear bumper was broken; the left rear wheel was broken and bent; the left rear tail light and assembly was broken and bent; the rear glasses were broken, all to the damage of the Plaintiff as aforesaid. The Plaintiff avers that all of his damages as aforesaid were proximately caused by the negligence of the Defendant;

wherefore he sues.

IN THE CIRCUIT COURT OF

DADE COUNTY, FLORIDA

1934

1582

BY M. J. MCGINNIS, Plaintiff

vs.

BY E. STEVEN NOGGIN, Defendant

SUMMONS AND COMPLAINT

*James G. Hendrix*  
Attorney for Plaintiff

DEPARTMENT OF REVENUE

For J. Hendrix Esq., Att.  
30 E. 11th St. N.W.  
Nashville, Tenn.

Received  
Sept 5 1934

