

LAW OFFICES OF  
D. R. COLEY, JR.  
302-6 FIRST FEDERAL SAVINGS BUILDING  
106 ST. JOSEPH STREET  
MOBILE, ALABAMA

CHRIS G. DE LANEY  
D. R. COLEY, III  
JOSEPH M. HOCKLANDER

September 13, 1956

3035

Mrs. Alice S. Duck, Clerk  
Circuit Court of Baldwin County  
County Court House  
Bay Minette, Alabama

Dear Mrs. Duck:

We would appreciate it if you will cause the  
enclosed bill of complaint to be filed in the Circuit  
Court of Baldwin County.

Very truly yours,



Joseph M. Hocklander

JMH - pmm

ETHEL LEE GRAY,  
Administratrix of the Estate  
of Eugene Gray, Deceased,

Plaintiff,

vs.

D. C. LAMBERT,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.


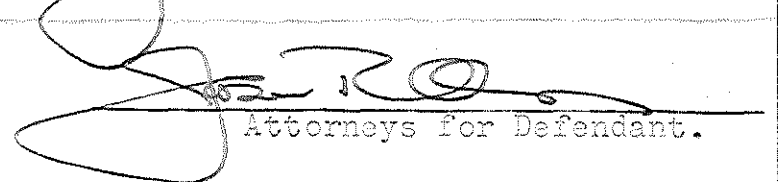
NO. 3035

P L E A:

Now comes the Defendant in the above styled cause, and for plea to the Complaint heretofore filed in said cause says spearately and severally:

1. Not guilty.

2. Plaintiff's intestate, at the time and place complained of, was guilty of negligence which proximately contributed to his injuries and death in this: That he walked from the East shoulder of Alabama Highway #59, and from a point of safety onto the said highway upon which he was walking, and which the deceased well knew was usually and rightfully used for automobile traffic, and that at said time and place, notwithstanding the fact that he was coming from the East shoulder of said highway from the point of safety, he walked immediately in front of and in such close proximity with the automobile referred to in the Complaint, which was then and there rightfully traveling along said highway and being operated by the Defendant, D. C. Lambert, that said automobile could not stop or be stopped, without striking the deceased and injuring him.

  
  
Attorneys for Defendant.

ETHEL LEE GRAY,  
Administratrix of the Estate  
of Eugene Gray, Deceased,

Plaintiff,

VS.

D. C. LAMBERT,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3035

DEMURRER TO COMPLAINT

Now comes the defendant and for demurrer to the complaint assigns, separately and severally, the following:

1. It does not state a cause of action.
2. It does not describe the place where the alleged accident happened with sufficient certainty.
3. No facts are alleged to show that the alleged accident occurred in Baldwin County, Alabama.

*J. B. Blackburn*  
*Joe. R. Owen*  
Attorneys for defendant.

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

Route 1,  
Uriah, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3035

Sept. TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon D. C. LAMBERT

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

D.C. LAMBERT, Defendant

by ETHEL LEE GRAY, Administratrix of the estate of Eugene Gray, deceased

Plaintiff

Witness my hand this 19 day of September 1956

Alice J. Duck, Clerk