

LULAH STEVENS MEADOR,
Plaintiff,

vs.

THE LIFE INSURANCE COMPANY
OF ALABAMA, INC., a
corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 3144.

PLEA

Now comes the Defendant and for plea to the complaint
as last amended says:

1. The allegations of the complaint are untrue.

J. B. Blackburn
Attorney for Defendant.

HAROLD WAYNE STEVENS,
A minor, suing by and
through his mother and
next best friend, LULAH
STEVENS MEADOR,

Plaintiff,

vs.

JAMES HENRY BOSWELL,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 3145.

P L E A

Now comes the Defendant and for plea to the amended
complaint filed in this cause on June 27, 1957, says:

1. Not guilty.

J. B. Blackburn
Attorney for Defendant.

HAROLD WAYNE STEVENS,
A minor, suing by and
through his mother and
next best friend,
LULAH STEVENS MEADOR,

Plaintiff

VS
VS

JAMES HENRY BOSWELL

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: _____

..-.-..

Comes now the Plaintiff in the above styled cause and amends the
Complaint to read as follows:

The Plaintiff claims of Defendant the sum of FIFTY THOUSAND and
NO/100 (\$50,000.00) DOLLARS, damages for that on to-wit, March 19, 1956
Defendant so negligently operated a motor vehicle in a northerly direction
on Alabama State Highway #5, a public road, at a point about two and two
tenths miles north of the northern City limits of Foley, Alabama, in
Baldwin County, Alabama, as to cause or allow the said motor vehicle to
colide with or run against the vehicle on which the plaintiff was riding,
which was then and there being driven in a southerly direction on said
Alabama State highway #5, and as a proximate consequence thereof, Plaintiff
was severely injured in that he suffered lacerations and bruises about
the head, shoulders, arms and body, a brain concussion, and was put to
expense for hospitalization, medical and doctor bills, hence this suit.

Attorney for Plaintiff

FILED

JUN 27 1957

ALICE L. DUCK, Clerk



Attorney for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY LAWFUL OFFICER OF SAID COUNTY:

Summon HAROLD WAYNE STEVENS and LULAH STEVENS MEADOR to be and appear before Louise J. Dusenbury, Court Reporter, at the Courthouse in Bay Minette, Alabama, at 9:30 A. M. on the 27th day of June, 1957, in the case of Harold Wayne Stevens, a minor, suing by and through his mother and next best friend, Lulah Stevens Meador, Plaintiff, vs. James Henry Boswell, Defendant, as a witness for the Defendant, and there make return of this writ.

WITNESS my hand on this the 6 day of June, 1957.

Louise J. Dusenbury
Clerk of the Circuit Court of Baldwin
County, Alabama.

HAROLD WAYNE STEVENS,
A minor, suing by and
through his mother and
next best friend,
LULAH STEVENS MEADOR,

Plaintiff,

vs.

JAMES HENRY BOSWELL,

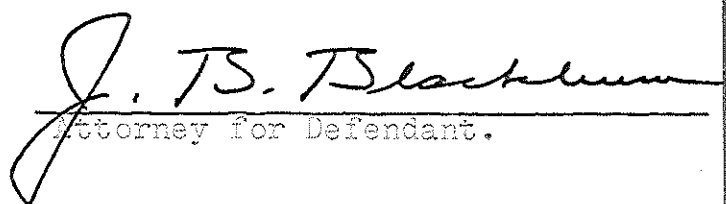
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 3145

DEMURRER

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. The allegations thereof are conclusions of the pleader.
3. The allegations thereof are vague, indefinite and uncertain and no facts are alleged to show where the alleged accident occurred.
4. No facts are alleged to show the exact place where the alleged accident happened.
5. The alleged injuries to the Plaintiff are not described with sufficient certainty.
6. The allegations thereof are vague, indefinite and uncertain.


Attorney for Defendant.

HAROLD WAYNE STEVENS,
A minor, suing by and
through his mother and
next best friend,
LULAH STEVENS MEADOR,

Plaintiff

VS

JAMES HENRY BOSWELL

Defendant

IN THE CIRCUIT COURT OF

BLADWIN COUNTY

ALABAMA

AT LAW

CASE# _____

The Plaintiff claims of the Defendant the sum of FIFTY THOUSAND AND 00/100 DOLLARS, (\$50,000.00), as damages for that heretofore and on to-wit: March 19, 1956 said JAMES HENRY BOSWELL, so negligently operated a motor vehicle on and along Alabama State Highway No. 3, a public highway in Baldwin County, Alabama and said Defendant was driving same in a northwardly direction between Robertsdale, Alabama and Foley, Alabama, that said Defendant caused the same to run into, over, on, and against the person of the Plaintiff who was then riding a motorcycle and traveling in a southwardly direction on Alabama State Highway No. 3 on the right side of the center line where he had a right to be and as a proximate and direct consequence whereof the Plaintiff was severely injured and damaged, suffered great pain and anguish by receiving a brain concussion, lacerations about the head, legs, arms, and body, was hospitalized and was ~~caused~~ to incur medical and hospital expenses, sustained both temporary and permanent physical injury and was put to great expense and will continue to be put to great expense in and about the medical treatment of himself, all as a direct and proximate result of the Defendant's negligence as aforesaid, hence this suit.



W. O. MAC MAHON, III
Attorney for Plaintiff



WILSON HAYES
Attorney for Plaintiff

The Plaintiff demands a trial of this cause by jury.

W. O. Mac Mahon
W. O. MAC MAHON, III
Attorney for Plaintiff

WILSON HAYES
Attorney for Plaintiff

DEFENDANT MAY BE SERVED AT:

Box 375
Robertsdale, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3115

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES HENRY BOSWELL

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 HENRY BOSWELL, Defendant

by HAROLD WAYNE STEVENS, A minor, suing by and through his mother
and next best friend, LULAH STEVENS MEADOR, Plaintiff.....

Witness my hand this 6th day of February 1957

Alice J. Black Clerk