

HAROLD WAYNE STEVENS,
a minor, suing by and
through his mother and
next best friend,
LULIAN STEVENS READOR,

Plaintiff

VS

MARIAM BOSWELL,

Defendant

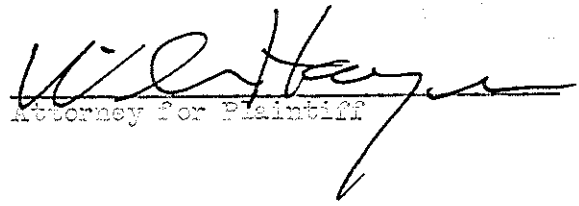
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 3146

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, acting through an agent, servant or employee, so negligently
operated a motor vehicle while acting in the line and scope of her employment
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
AUG 30 1957
ALICE J. DUCK, Register

Attorney for Plaintiff

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

Plaintiff,

vs.

MARIAM BOSWELL,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

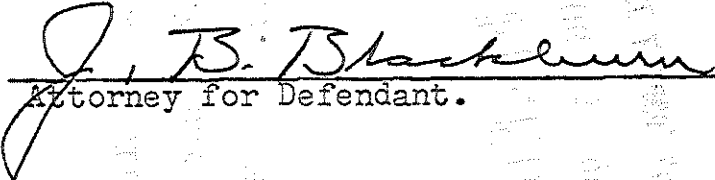
AT LAW.

NO. 3146.

DEMURRER

Now comes the Defendant and for demurrer to the amended complaint filed in this cause of June 27, 1957, assigns separately and severally the following:

1. It does not state a cause of action.
2. No facts are alleged on which the relief sought can be granted.
3. It is vague, indefinite and uncertain in that it does not allege the name of the Defendant's agent, servant or employee.
4. No facts are alleged to show that the Defendant's agent, servant or employee was operating within the line and scope of his authority at the time of the alleged accident.


Attorney for Defendant.

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

Plaintiff

VS

MARIAM 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, acting through an agent, servant or employee, so negligently
operated a motor vehicle in a northerly direction on Alabama State Highway
#3, 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 #3, 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.

FILED

JUN 27 1957

ALICE J. BUCK, Clerk

Attorney for Plaintiff

Will H. Hagan

Attorney for Plaintiff

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

Plaintiff,

vs.

MIRIAM BOSWELL,

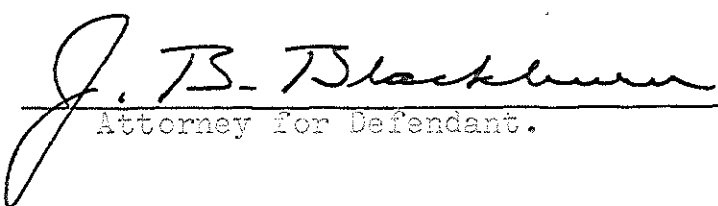
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 3146.

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.
4. The allegations thereof are vague, indefinite and uncertain and no facts are alleged to show where the alleged accident occurred.
5. No facts are alleged to show the exact place where the alleged accident happened.
6. The alleged injuries to the Plaintiff are not described with sufficient certainty.
7. No facts are alleged to show who was driving the Defendant's automobile at the time and place of the alleged accident.
8. No facts are alleged to show the name of the person who is alleged to be the employee of the Defendant.


Attorney for Defendant.

FILED

MAR 9 1957

W. B. B. B.

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

Plaintiff,

vs.

MARIAM BOSWELL,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW. NO. 3146.

PLEA

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

MARIAM BOSWELL,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 3146

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, acting through an agent, servant or employee, who was then and
there acting within the line and scope of his authority as such agent,
servant or employee so negligently operated a motor vehicle in a northerly
direction on Alabama State Highway #3, 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 #3, 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.

W. L. Harn
Attorney for Plaintiff
of Counsel for Plaintiff

HAROLD WAYNE STEVENS,
a monor, suing by and
through his mother and
next best friend,
LULAH STEVENS MEADOR,

Plaintiff

VS

MARIAM BOSWELL,

Defendant

IN THE CIRCUIT COURT OF


BLADWIN COUNTY

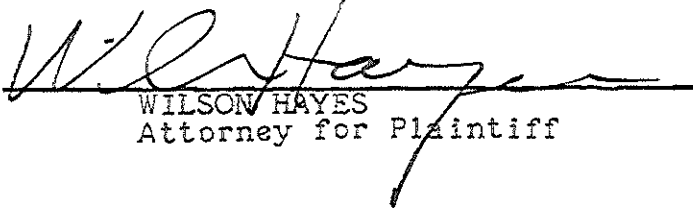
ALABAMA

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, an agent, servant, or employee of the Defendant, while acting in the line and scope of his authority as such agent, servant, or employee, so negligently drove or operated a motor vehicle or truck on or along Alabama State Highway No. 3, Baldwin County, Alabama, in a northwardly direction between Robertsdale, Alabama and Foley, Alabama, which was then and there a public highway in Baldwin County, Alabama as to run into, upon, against or collide with the Plaintiff, who was traveling on a motorcycle 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 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, III
Attorney for Plaintiff


WILSON HAYES
Attorney for Plaintiff

THE 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. 3116

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MARIAM 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 _____
MARIAM BOSWELL, Defendant

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

Witness my hand this 6th day of February 19 57

Alice J. Duck, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HAROLD WAYNE STEVENS, a minor,

suing by and through his mother and
next friend, LULAH STEVENS MEADOR
Plaintiffs

vs.

MARTAM BOSWELL

Defendants

SUMMONS and COMPLAINT

Filed 2/6/57, 1957

Wince Jones Clerk

Plaintiff's Attorney

Defendant's Attorney

RECEIVED IN OFFICE

2/6, 1957

, Sheriff

I have executed this summons

this 11 Feb, 1957

by leaving a copy with

Mariam Boswell

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY

Steadham

Taylor Wilkins Sheriff
Alfred Steadham Deputy Sheriff


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. Miriam 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.


Clerk of the Circuit Court of Baldwin
County, Alabama.