

Amended Complaint, No. 2

Norman L. Hardy
Plaintiff

Vs

Clyde B. Perkins
Defendant

In the Circuit Court of
Baldwin County, Alabama
At Law, No. _____

The plaintiff claims of the Defendant One hundred seventy one and 50/100 dollars as damages, as the proximate consequence of a collision between the automobile of the Plaintiff and that of the Defendant, on the 21st day of June, 1956, upon a public highway, Highway 31, near Hobbs store, in the City of Bay Minette, in Baldwin County, Alabama. On to wit that date, the Defendant did so negligently operate his automobile upon said public highway, as to run it upon or against the automobile of the Plaintiff, bending, bruising and breaking, marring and scraping the left side of Plaintiff's automobile and tearing the left door panel and molding, so that they had to be replaced as unusable, all to the damage of the Plaintiff, as the proximate result of the negligence of the defendant as aforesaid.

Robert L. McKee
Attorney for the Plaintiff

Plaintiff demands a trial by jury.

Robert F. McFarlane
Attorney for the Plaintiff

Filed
Oct. 20, 1959

Defendant.

AT LAW. NO. 3166.

Norman L. Hardy
Plaintiff
Vs
Clyde B. Perkins
Defendent

In the Circuit Court of
Baldwin County, Alabama
At Law. No. _____

Paul F. Miller
Attorney for the Plaintiff

Paul J. McLean
Attorney for the Plaintiff


NORMAN L. HARDY,
Plaintiff,
vs.
CLYDE B. PERKINS,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE. NO. 3166.

DEMURRER:

Now comes the Defendant in the above styled cause and demurs to the Complaint heretofore filed in this cause and as grounds for said demurrer, assigns the following, separately and severally:

1. The said Complaint does not allege with sufficient certainty where the alleged accident occurred.
2. The said Complaint does not allege with sufficient certainty the damages suffered by the automobile of the Plaintiff.
3. The said Complaint does not allege that Plaintiff's damages were the proximate result of the negligence of the Defendant.

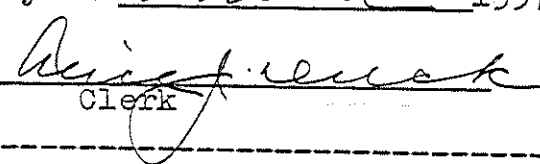

Attorney for Defendant.

State of Alabama
County of Baldwin

To any Sheriff of the State of Alabama:

You are hereby commanded to summon Clyde B. Perkins to appear and plead, Answer or demur within thirty days to the Bill of Complaint filed in the Circuit Court of said County by Norman L. Hardy as Plaintiff and against Clyde B. Perkins as Defendant.

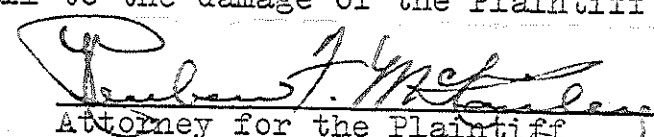
Witness my hand this the 19 day of March 1957.


Clerk

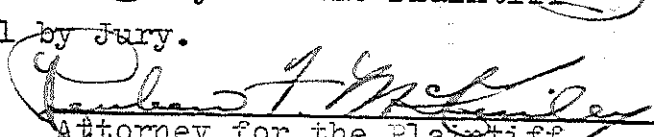
Norman L. Hardy
Plaintiff
Vs
Clyde B. Perkins
Defendant

In the Circuit Court of
Baldwin County, Alabama
At Law. ~~XXXXXX~~
No. _____

The Plaintiff claims of the Defendant One Hundred seventy ^{one} and 50/100 Dollars as damages, as the proximate consequence of a collision between the automobile of the Plaintiff and that of the Defendant, on to wit the 21st day of June, 1956 upon ~~in~~ a public highway in Baldwin County, Alabama. On to wit that date, the defendant did so negligently operate his automobile upon a public highway as to run it upon or against the automobile of the Plaintiff, bending, bruising and breaking, marring and scraping the left side of Plaintiffs automobile, all to the damage of the Plaintiff as aforesaid.


Attorney for the Plaintiff

Plaintiff demands a trial by Jury.


Attorney for the Plaintiff

jury list Spring 1958

1. Huffman, Winfred C.	Gov't Employee	Bay Minette, Ala.
2. Ellison, W.H.	Farmer	Robertsdale
3. Simon, A.D.	Farmer	Daphne
4. Bauer, John	Farmer	Summerdale
5. Lazzari, John	Farmer	Belforest
6. Racine, Floyd A.	Truck Driver	Robertsdale
7. Guthrie, Hershey	Farmer	Gulf Shores
8. Daring, Rudolph S.	Merchant	Foley
9. Little, Sam	Mechanic	Bay Minette
10. Sims, James F.	Farmer	Rabon
11. Moorer, Douglas	Clerk	Bay Minette
12. Sadler, Frank D.	Post Office Emp.	Fairhope
13. Capps, James C.	Merchant	Bay Minette
14. Benik, Edward	Farmer	Belforest
15. Good, John, Jr.	Farmer	Elberta
16. Kochler, Charles C.	Retired	Elberta
17. Long, Alfred	Farmer	Stockton
18. Fuqua, Damon L.	Gov't Emp.	Gulf Shores
19. Golden, David, Jr.	Merchant	Foley
20. Dubose, Hobson	Farmer	Summerdale
21. Lazzari, Alex V.	Farmer	Belforest
22. Cleverdon, Paul L.	Farmer	Summerdale
23. Peavy, Richard V.	Building Sup't	Foley
24. Resmondo, Raymond J.	Farmer	Lillian
25. Hodges, William Herndon	Bookkeeper	Stockton
26. Jackson, Admiral Dewey	Farmer	Lottie,
27. Stewart, Frank	State Emp.	Gulf Shores
28. McCants, Joe	Brookley Field	Fairhope
29. Woolf, George	Timberman	Tensaw
30. Gullledge, Aris	Laborer	Robertsdale
31. Selzmann, Emil Joe	Farmer	Elberta
32. Stewart, Leander	Farmer	Rabon

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