

WILEY C. SAWYER,
Plaintiff

vs.

FRANK JAMES,
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW.

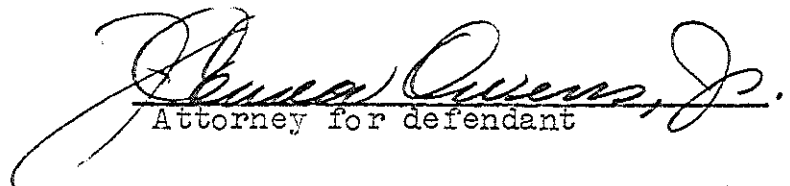
NO.

3226

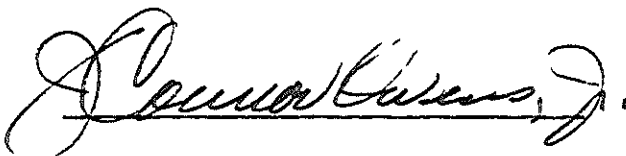
ANSWER

Now comes the defendant, by his attorney, and for answer to the complaint filed in this cause, and each count thereof, separately and severally, says:

1. Not guilty.
2. The defendant alleges that at the time and place alleged therein, the plaintiff was himself guilty of negligence which proximately contributed to his alleged injuries in that the plaintiff so negligently operated the automobile in which the plaintiff was riding as to cause or allow the same to run into, upon or against the automobile of the defendant, hence the plaintiff should not recover.


Attorney for defendant

Defendant demands a trial by jury.



IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3226.

WILEY C. SAWYER,

Plaintiff

vs.

FRANK JAMES,

Defendant

ANSWER

FILED
JUN 19 1957
ALICE A. BUCH, Clerk

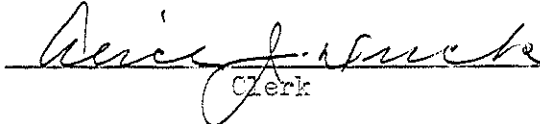
J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 Court House Square
BAY MINETTE, ALABAMA

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons FRANK JAMES 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 WILEY C. SAWYER.

Witness my hand this the 30 day of April, 1957.


Clerk

WILEY C. SAWYER,

Plaintiff,

vs.

FRANK JAMES,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. _____

COUNT 1.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that on to-wit: September 8, 1956, the Plaintiff's automobile was being operated along and upon a public highway in Baldwin County, Alabama, to-wit, Alabama Highway Number 59, at a point about five miles North of the town of Stockton, Alabama, and that then and there the Defendant negligently drove an automobile into or against the automobile belonging to the Plaintiff, causing great damages and injuries to the Plaintiff's automobile: the front bumper was broken and bent, the left front fender and headlight was smashed and broken, the windshield was broken, the radiator was broken and bent and the grill work was smashed, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the Defendant, in that he negligently caused, allowed or permitted said automobile to run into or against the automobile of the Plaintiff and as a proximate consequence thereof the Plaintiff's automobile was damaged and injured as aforesaid, hence this suit.

COUNT 2.

The Plaintiff claims of the Defendant, the sum of FIVE HUNDRED (\$500.00)

Received 30 day of April 1957
and on 27 day of May 1957
I served a copy of the within E/O
on Frank James

By service on _____

TAYLOR WILKINS, Sheriff
By W. G. Talbot D. S.
Latham

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY Talbot
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 37-26

WILEY C. SAWYER,

Plaintiff,

vs.

FRANK JAMES,

Defendant.

Defendant resides at
Latham

SUMMONS OF COMPLAINT.

FILED

APR 30 1957

ALICE L. DUCK, CLERK

JAMES A. HENDRIX

ATTORNEY AT LAW

ROBERTSDALE, ALA.

*We the jury find
for the Plaintiff \$500.00
by D. E. Delmonico*