

EMMANUEL JONES,

Plaintiff,

vs.

LEVI PAUL,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

DEMURRER

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That said complaint does not sue for any specific sum of money.
3. That the amount sued for in this cause is vague and indefinite.
4. That said complaint does not allege any duty owing from the Defendant to the Plaintiff.
5. That said complaint does not allege that the accident occurred upon a public highway in Baldwin County, Alabama.
6. That said complaint does not allege that the Defendant negligently injured the Plaintiff.
7. For aught that appears from said complaint the Plaintiff was not where he had a right to be at the time of the accident.
8. That the place where the accident occurred is not sufficiently set out as the complaint is indefinite as to whether it has reference to the railroad being at the West edge of Bay Minette or whether the accident occurred at the West edge of Bay Minette.
9. That said complaint does not allege whether the Plaintiff's right leg or his left leg was broken.
10. That the allegation in the complaint that the Plaintiff was caused to incur great expense in and about curing and healing his injuries is vague and indefinite and does not sufficiently set out what such expenses consisted of.

11. That said Complaint does not allege how much time the Plaintiff lost from his work.

12. That said complaint does not allege that the Plaintiff had any business or place of employment at the time he was injured.

*Sharon A. Stone*  
*Ray. John Chason*  
Attorneys for Defendant


STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LEVI PAUL 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 EMMANUEL JONES.

WITNESS my hand, this 23 day of September, 1957.

  
Clerk.

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EMMANUEL JONES,

Plaintiff,

vs.

LEVI PAUL,

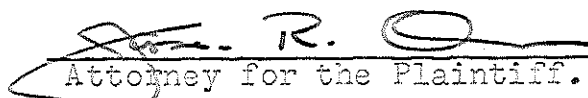
Defendant.

! ! ! ! !

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

COMPLAINT:

Plaintiff claims of the Defendant the sum of, to-wit, TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00) as damages, for that, heretofore, on, to-wit, the 27th day of July, 1957, the Defendant so negligently operated an automobile on U. S. Highway No. 31, in Baldwin County, Alabama, at a point approximately three-tenths of a mile South of where the said highway crosses over the Louisville & Nashville Railroad at the West edge of the City of Bay Minette, Baldwin County, Alabama, that the same was run upon or against Plaintiff, and as a proximate consequence thereof, Plaintiff's leg was broken, he was badly sprained and bruised, he was caused to suffer great physical and mental pain and anguish, and he was caused to incur great expense in and about curing and healing his said injuries and was caused to lose time from his work. And Plaintiff avers that he suffered said injuries and consequent damages as a proximate consequence of the aforesaid negligence of the Defendant.

  
Attorney for the Plaintiff.

Plaintiff demands a trial of  
said cause by Jury.

James R. O.

Attorney for the Plaintiff.

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# SUMMONS AND COMPLAINT

by service on Lauri Paul

Plaintiff,

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LEVI PAUL,

Defendant,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

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**JAMES R. OWEN**  
ATTORNEY AT LAW  
**BAY MINETTE, ALABAMA**

*Adelphiocorypha*