

JOSEPH G. LAW,

Plaintiff,

vs.

ROBERT LEE BEASLEY,

Defendant.

X

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3417

Comes now the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds in support thereof:

1. That said complaint does not state which city limit of Mobile is referred to.

2. That the place where the accident occurred is not sufficiently set out.

3. That said complaint fails to allege that the Defendant negligently operated a truck at the time and place complained of in the complaint.

4. That said complaint does not allege that the Defendant negligently injured the Plaintiff.

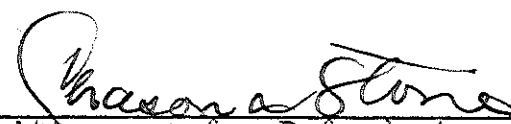
5. That said complaint does not sufficiently set out the damages to the automobile being driven by the Plaintiff.

6. That said complaint does not allege that the Plaintiff was the owner of the automobile that he was driving.

7. That said complaint does not allege that the Plaintiff was employed in any occupation at the time of his injury.

8. That said complaint does not allege the length of time that the Plaintiff lost from his business.

9. That said complaint does not allege that the Plaintiff was using his automobile in connection with his business at the time it was damaged.


Attorneys for Defendant

JOSEPH G. LAW,

Plaintiff

VS

ROBERT LEE BEASLEY,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 3417

The Plaintiff claims of the Defendant the sum of FIFTEEN HUNDRED (\$1500.00) DOLLARS as damages for that heretofore and on, towit: The 7th day of August, 1957, while the Plaintiff was traveling eastwardly on U.S. Highway 90, a Public Highway in Baldwin County, about four miles east of the Mobile City limits, the Defendant so negligently operated a truck on the highway aforementioned, that it collided with the Plaintiff's automobile; and as a direct and proximate result of such negligence as aforesaid, the automobile of the Plaintiff was badly bent, damaged and torn; the Plaintiff was jarred about the neck and back and was made sick, bruised and sore; he was caused to lose time from his business and was deprived of the use of his automobile, hence this suit.

Bellfield T. Wells
BELLFIELD T. WELLS
Attorney for Plaintiff

The Plaintiff demands a trial by jury.

Bellfield T. Wells
BELLFIELD T. WELLS
Attorney for Plaintiff

Defendant may be served at:

808 D. Airport Hill
Birmingham, Alabama

or

Cloverleaf Butter Company
Birmingham, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3417

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ROBERT LEE BEASLEY

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

ROBERT LEE BEASLEY, Defendant

by JOSEPH G. LAW

Plaintiff

Witness my hand this 4th day of Dec. 1957

August J. Kunkle, Clerk