

3433

BALDWIN COUNTY, ALABAMA

AT LAW.

Defendant.

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and each and every count thereof, separately and severally and assign the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That Count One of said complaint does not allege that the Plaintiff was employed at the time of his injury.

Chas. E. Stone
Attorneys for Defendant.

3433 RECORDED

DEMURRER

ALFRED JONES,

Plaintiff,

vs.

NONIE C. BETSIARAS,

Defendant.

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

FILED
JAN 13 1958
ALICE J. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

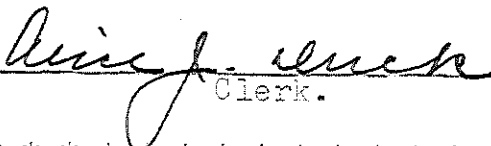
STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon NONIE C. BETSIARAS 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 same, then and there to answer the complaint of ALFRED JONES.

WITNESS my hand this 21 day of December, 1957.


Clerk.

ALFRED JONES,	*	
	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	
	*	BALDWIN COUNTY, ALABAMA
vs.	*	
	*	AT LAW.
NONIE C. BETSIARAS,	*	
	*	
Defendant.	*	

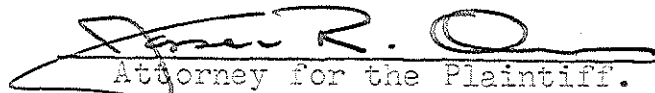
COUNT ONE:

The Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND DOLLARS (\$15,000.00) as damages, for that on, to-wit, October 21, 1957, the Defendant so negligently operated a motor vehicle on United States Highway Number 31, in Baldwin County, Alabama, at a point on the said highway in front of Town and Country Restaurant, which point is 7.2 miles East of the City Limits of Mobile, Alabama, as to cause or allow said motor vehicle to run into, over or against an automobile which was then and there being driven along said highway by the Plaintiff, which said automobile was owned by the Plaintiff, and as a proximate consequence of such negligence, the Plaintiff was injured in this: his right knee was broken and otherwise severely damaged; he was bruised and caused to suffer severe pain and mental anguish; he was caused to be confined in a hospital; he was caused to incur hospital and

medical bills; he was caused to lose several weeks from his employment and his right knee was permanently injured, all to the damage of the Plaintiff in the sum above mentioned, wherefore, Plaintiff brings this suit and asks judgment in the above amount.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of EIGHTEEN HUNDRED DOLLARS (\$1800.00) for that on, to-wit, October 21, 1957, the Defendant so negligently operated a motor vehicle on United States Highway Number 31, in Baldwin County, Alabama, at a point in front of the Town and Country Restaurant, which point is 7.2 miles East of the City Limits of Mobile, Alabama, as to cause or allow said motor vehicle to run into, over of against an automobile which was then and there being driven along such highway by the Plaintiff, which said automobile was owned by the Plaintiff and as a proximate consequence of such negligence the Plaintiff was damaged in this: his 1956 model Ford automobile was completely demolished, all to the damage of the Plaintiff in the above sum, wherefore, the Plaintiff brings this suit and asks judgment in the above amount.


Attorney for the Plaintiff.

Plaintiff demands a trial of
said cause by a jury.


Attorney for the Plaintiff.

5759 RECORD

Received 28 day of Dec 1957
and on 28 day of Dec 1957
I served a copy of the within JP
on Nonie C. Betiaras

By service on _____
TAYLOR WILKINS, Clerk
By Edlugh Steadham D.S.

Daphne, Ala

SUMMONS AND COMPLAINT

ALFRED JONES,
Plaintiff,

vs.

NONIE C. BETSIARAS,
Defendant.

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

Sheriff claims 54 miles to
Ten Cents per mile Total 540
TAYLOR WILKINS, Sheriff
BY Steadham
DEPUTY SHERIFF

FILED
DEC 21 1957
ALICE A. DUCK, Clerk

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA