

ETHEL M. WILSON,	Y	
Plaintiff,	Y	IN THE CIRCUIT COURT OF
	Y	
vs.	Y	BALDWIN COUNTY, ALABAMA
	Y	
HUBERT HARVILLE and ARTHUR	Y	
L. HARVILLE,	Y	AT LAW
Defendants.	Y	

Comes now the Plaintiff in the above styled cause and amends her complaint by adding thereto "COUNT TWO" as follows:

COUNT TWO:

The Plaintiff claims of the Defendant Hubert Harville the sum of Twenty-five Thousand Dollars (\$25,000.00) as damages for that on, to-wit: January 30, 1959, the Defendant Hubert Harville so negligently operated a motor vehicle on U. S. Highway 31, a public road in Baldwin County, Alabama, at a point approximately two miles North-east of Stapleton in Baldwin County, Alabama, as to cause or allow the same to run into, upon or against an automobile in which the Plaintiff was riding, and as a proximate consequence and result of the negligence of the Defendant aforesaid the Plaintiff was seriously and permanently injured in this: she had multiple lacerations of the head, face, legs and body; she had bilateral hemo-pneumo thorax; she received multiple rib fractures on both sides of the chest; she received complete avulsion and depression of the entire breast plate; she was caused to suffer severe pain and mental anguish; she was caused to suffer large hospital and medical expenses, she lost three months of time from her employment where she was then employed, all to her damages in the sum aforesaid, hence this suit.

CHASON & STONE

By: 

Attorneys for Plaintiff

Filed
3-17-60

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Hubert Harville 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 Ethel M. Wilson.

Witness my hand on this the 4 day of April, 1959.

W. J. H. H. H.
Clerk

CA 4-29-59
ETHEL M. WILSON,

Plaintiff,

vs.

HUBERT HARVILLE,

Defendant.

I
I
I
I
I
I
I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of Twenty-five Thousand Dollars (\$25,000.00) as damages for that on, to-wit: January 30, 1959, on U. S. Highway 31 at a point about two miles North of Stapleton in Baldwin County, Alabama, the Defendant negligently drove his automobile into, upon or against an automobile in which the Plaintiff was riding at said time and place and as a proximate result of the negligence of such Defendant the Plaintiff was injured in this: she had multiple lacerations of the head, face, legs, and body; she had bilateral hemo-pneumo-thorax; she received multiple rib fractures on both sides of the chest; she received complete avulsion and depression of the entire breast plate; she was permanently injured; she was caused to suffer severe pain and mental anguish; she was caused to suffer large hospital and medical

expenses, she lost three months of time from her employment where she was then employed, all to her damages in the sum aforementioned, hence this suit.


Attorneys for Plaintiff

The Plaintiff demands a trial of this cause by a jury.


Attorneys for Plaintiff

Received 16 day of April 1959
d on 29 day of April 1959
served a copy of the within Hubert Harville
service on _____
TAYLOR WILKINS, Sheriff
By J. Smith D. S.

CD 1550 3807 ✓ 205

ETHEL M. WILSON,
Plaintiff,

19x
Jm vs.

HUBERT HARVILLE,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED
APR 8 1959
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

ETHEL M. WILSON,

Plaintiff,

-VS-

HUBERT HARVILLE,

Defendant.

I

I

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

DEMURRERS

Comes the Defendant in the above styled cause and offers the following demurrers to the Plaintiff's complaint:

1. Said complaint merely alleges that the act of the defendant was negligently done without showing it was actionable negligence.

2. Said complaint does not show how said accident took place.

3. Said complaint does not show in which direction either of the cars were going at the time of the accident.

4. Said complaint does not show who was driving the car in which the Plaintiff was riding.


5. Said complaint does not show what permanent injuries Plaintiff suffered.

6. Said complaint does not show that the Plaintiff, ETHEL M. WILSON, had a legal right to be so riding at such time and place.

FILED

MAY 29 1959

ALICE J. DUCK, CLERK
REGISTER


E. G. RICKARBY
Attorney for Defendant.

3887

ETHEL M. WILSON,

Plaintiff,

-VS-

HUBERT HARVILLE,

Defendant.

DEMURRERS

FILED

MAY 29 1959

ALICE J. DUCK, CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

ETHEL M. WILSON,

Plaintiff,

- VS -

HUBERT HARVILLE,

Defendant.

I
I
I
I
I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

P L E A S

Comes the defendant in the above styled cause and offers the following separate and several pleas:

1. The defendant for answer to the complaint says that he is not guilty of the matters alleged therein.
2. The defendant avers that the allegations of the complaint are untrue.
3. General Issue.

FILED

JUN 25 1959

ALICE J. DUCK, CLERK
REGISTER


E. G. RICKABY,


KENNETH COOPER,

Attorneys for Defendant.

3807

1. The first of the above mentioned items is a copy of the report of the committee on the subject of the proposed amendment to the constitution of the State of New York, passed at the session of the Legislature in 1901, and is now on file in the office of the Secretary of State.

2. The second of the above mentioned items is a copy of the report of the committee on the subject of the proposed amendment to the constitution of the State of New York, passed at the session of the Legislature in 1901, and is now on file in the office of the Secretary of State.

3. The third of the above mentioned items is a copy of the report of the committee on the subject of the proposed amendment to the constitution of the State of New York, passed at the session of the Legislature in 1901, and is now on file in the office of the Secretary of State.

4. The fourth of the above mentioned items is a copy of the report of the committee on the subject of the proposed amendment to the constitution of the State of New York, passed at the session of the Legislature in 1901, and is now on file in the office of the Secretary of State.

FILED
JUN 25 1903
ALICE J. DUCK, CLERK
REGISTER

RECEIVED

RECEIVED

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Arthur L. Harville 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 Ethel M. Wilson.

Witness my hand this 3 day of August, 1959.

8-18-59
FILED
1959
ALICE J. DUCK, CLERK
REGISTER

Alice J. Duck
Clerk

ETHEL M. WILSON,	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
HUBERT HARVILLE,	X	
Defendant.	X	AT LAW

Comes the Plaintiff in the above styled cause and amends her complaint filed in said cause so that the same shall read as follows:

ETHEL M. WILSON,	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
HUBERT HARVILLE and ARTHUR	X	
L. HARVILLE,	X	AT LAW
Defendants.	X	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Twenty-five Thousand Dollars (\$25,000.00) as damages for that on, to-wit: January 30, 1959, on U. S. Highway 31, at a point about two miles Northeast of Stapleton in Baldwin County, Alabama, the Defendant Arthur L. Harville, acting by and through his agent, servant or employee Hubert Harville, who was then and there acting within the line and scope of his employment as such, negligently ran his automobile into, upon or against an automobile in which the Plaintiff was riding at said time and place and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: she had multiple lacerations of the head, face, legs and body; she had bilateral hemo-pneumo-thorax; she received multiple rib fractures on both sides of the chest; she received complete avulsion and depression of the entire breast plate; she was permanently injured; she was caused to suffer severe pain and mental anguish; she was caused to suffer large hospital and medical expenses, she lost three months of time from her employment where she was then employed, all to her damages in the sum aforesaid, hence this suit.

Plaintiff demands a trial of this cause by jury.

Sharon & Stone

Sharon & Stone
Attorneys for Plaintiff

1694 3807 422
ETHEL M. WILSON,

Plaintiff,

vs.

HUBERT HARVILLE,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

AMENDED COMPLAINT

RETURNED

8-12-59

Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff

By L. Smith D. S.

Sheriff claims 22 miles at

Ten Cents per mile Total \$ 2.20

TAYLOR WILKINS, Sheriff

BY Talbert
DEPUTY SHERIFF

FILED

AUG 8 1959

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

we find in favor
of defendant
Wayne Douglas

ETHEL M. WILSON,
Plaintiff,

-vs-


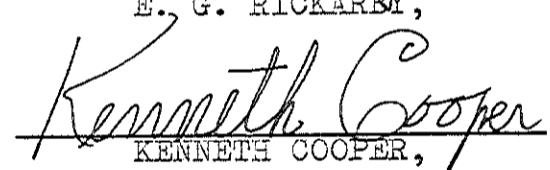
HUBERT HARVILLE, AND
ARTHUR L. HARVILLE
Defendant.

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

P L E A S

Comes the defendant in the above styled cause and to the plaintiff's complaint as ammended offers the following separate and several pleas:

1. The defendant for answer to the complaint says that he is not guilty of the matters alleged therein.
2. The defendant avers that the allegations of the complaint are untrue.
3. General Issue.


E. G. RICKARBY,

KENNETH COOPER,

Attorneys for Defendant.

*Filed 8-18-54
A. J. H. H. H.
Clerk*

ETHEL M. WILSON, As the
Mother and next friend of
LINDA KAY WILSON, a minor,

Plaintiff,

-VS-

HUBERT HARVILLE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.



DEMURRER

Comes the defendant in the above styled cause and offers
to the following separate and several demurs to the Plaintiff's
complaint as amended.

1. That the said complaint shows no facts which would
authorize the Plaintiff to recover from the Defendant.

2. Said complaint does not show that Ethel M. Wilson
has a right to recover for injuries suffered by Linda Kay Wilson.

*Filed
3/18/54
A. G. Rickarby
Clerk*


E. G. RICKARBY

KENNETH COOPER
Attorneys for Defendant

ETHEL M. WILSON,

Plaintiff,

-VS-

HUBERT HARVILLE, AND
ARTHUR L. HARVILLE

Defendant.

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

P L E A S

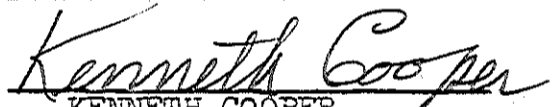
Comes the defendant, ARTHUR L. HARVILLE, and to the
plaintiff's complaint as amended offers the following separate
and several pleas:

1. The defendant for answer to the complaint says
that he is not guilty of the matters alleged therein.
2. The defendant avers that the allegations of the
complaint are untrue.
3. General Issue.



E. G. RICKARBY,
Attorney for Defendant.

Filed
8-28-59



KENNETH COOPER,
Attorney for Defendant.

Copy of Plea served on
Mr John Chason by
Kenneth Cooper this date

Kenneth Cooper

3807

FILED

AUG 28 1957

ALICE J. DICK, CLERK
REGISTER

~~ETHEL M. WILSON, as the~~
~~Mother and next friend of~~
LINDA KAY WILSON, a minor,
suing by ETHEL M. WILSON as her
Mother and next friend, Plaintiff,

vs.

HUBERT HARVILLE and ARTHUR
L. HARVILLE,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Plaintiff in the above styled cause and amends
her complaint by adding thereto "COUNT TWO" as follows:

COUNT TWO:

The Plaintiff claims of the Defendant Hubert Harville the
sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on,
to-wit: January 30, 1959, the Defendant Hubert Harville so negligent-
ly operated a motor vehicle on U. S. Highway 31, a public road, in
Baldwin County, Alabama, at a point approximately two miles Northeast
of Stapleton in Baldwin County, Alabama, as to cause or allow the
same to run into, upon or against an automobile in which Linda Kay
Wilson, a minor, was riding at said time and place, and as a proxi-
mate result of the negligence of the Defendant aforesaid, the said
Linda Kay Wilson was injured in this: her face was lacerated, her jaw
was broken, her teeth were seriously damaged and she was caused to
suffer abraisions and contusions and she was caused to suffer much
pain and mental anguish and was permanently injured. She was caused
to incur large hospital and medical bills, all to the damage of the
Plaintiff in the sum aforesaid, hence this suit.

CHASON & STONE

Filed
3-17-68

By: 
Attorneys for Plaintiff

TELEPHONE WA 8-9836

LAW OFFICES

P. O. BOX 71

E. G. RICKARBY

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

October 27, 1959

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Wilson
Vs: Harville
case #3808

Enclosed find Pleas.

Yours very truly,



EGR/bs
Enclosure