

JOHN W. JOHNSON,
Plaintiff,

-VS-

FORREST C. BRADFORD,
Defendant.

: IN THE CIRCUIT COURT OF
: BALDWIN COUNTY, ALABAMA.
:
: AT LAW.
:
: CASE NO. 3883

Comes now the Defendant in the above-styled cause and for
answer to the Complaint heretofore filed in this cause,
interposes the following separate and several pleas:

PLEA ONE

Not guilty.


PLEA TWO

The allegations of the Complaint are untrue.

FILED

MAR 14 1961

Alice J. Duck, CLERK
REGISTER


CECIL B. KING,
Attorney for Defendant,
533 First National Bank Building
Mobile, Alabama.

JOHN W. JOHNSON,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA.
-VS-)	AT LAW.
FORREST C. BRADFORD and)	
JESSIE P. BRADFORD,)	
Defendants.)	CASE NO. <u>3883</u>

D E M U R R E R

Come now the Defendants, jointly and severally, in the above entitled cause and demur to Plaintiff's complaint and as grounds for demurrer set down and assign the following separately and severally:

1. Said complaint fails to allege the violation of any duty owed by the Defendants to the Plaintiff.
2. Said complaint fails to allege facts showing the violation of any duty owed by the Defendants to the Plaintiff.
3. For aught that appears, the alleged accident did not occur on a public highway.
4. For aught that appears from said complaint, the Plaintiff's motor vehicle was not at a place where it then and there had a legal right to be.
5. For aught that appears, the Defendants did not negligently injure the Plaintiff.
6. For aught that appears from said complaint, the damages suffered by the Plaintiff were not the proximate result of any act or failure to act by the Defendants.
7. For that the said complaint fails to allege any causal connection between the alleged negligence of the Defendants and the alleged injuries and damages of the Plaintiff.
8. For that the said complaint fails to allege sufficient facts to constitute a cause of action.

KING AND MARR, ATTORNEYS

BY: 
Attorneys for Defendants

FILED

JUL 24 1953

MINE I. CHAM, CLERK

JOHN W. JOHNSON

X

Plaintiff

X

IN THE CIRCUIT COURT OF

VS

X

BALDWIN COUNTY, ALABAMA

FORREST C. BRADFORD and
JESSIE P. BRADFORD

X

CIVIL JURY NO. 3883

Defendant

X

X

Comes Hugh Rozelle and Thompson & White and file their
appearance as attorneys *for the Plaintiff* in the above styled cause.

HUGH ROZELLE
THOMPSON & WHITE

FILED
OCT 24 1950
JAMES L. DICK, CLERK
BALDWIN COUNTY REGISTER

BY:

[Signature]
Attorneys for Plaintiff

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Forrest C. Bradford and Jessie P. Bradford, 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 John W. Johnson.

Witness my hand this 24 day of June, 1959.

Rice J. Huch
Clerk

Recd-6-26-59
6-29-59

JOHN W. JOHNSON,

Plaintiff,

vs.

FORREST C. BRADFORD and
JESSIE P. BRADFORD,

Defendants.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


AT LAW

The Plaintiff claims of the Defendants the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on, to-wit: March 6, 1959, the Defendant Forrest C. Bradford, acting by and through his agent, servant or employee, Jessie P. Bradford, who was then and there acting within the line and scope of his employment as such, at a point on U. S. Highway 31, about two miles Northeast of Stapleton, Baldwin County, Alabama, negligently drove an automobile into, upon or against a pick-up truck which was then and there being driven by the Plaintiff and as a proximate result of the Defendants negligence the Plaintiff was injured in this: his left arm was broken, his left elbow was permanently injured and damaged so that he now only has partial use of his left arm, his left heel was split open, he was caused to incur a hernia, he received severe bruises and lacerations on his body, his left arm will be partially, permanently disabled, he has already lost four months from his occupation and will continue

to lose additional time, he has been caused to incur large medical and hospital expenses and in the future will continue to incur such expenses and he was caused to suffer severe pain and mental anguish and the Plaintiff avers that the negligence of such Defendants was the proximate cause of the Plaintiff's injuries and damages, hence this suit.


Attorneys for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorneys for Plaintiff

Filed . 6-24-59

CD 1650 ✓ 710.3883
378

JOHN W. JOHNSON,
Plaintiff,

vs.

^{26th} Ad. ^{29th} Day
FORREST C. BRADFORD and JESSIE
P. BRADFORD,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE

EXECUTED

This 26 day of June, 19 55
by serving a copy of the within on
Forrest C. Bradford
RAY D. BRIDGES, Sheriff
By J. W. Lloyd D. S.

EXECUTED

This 29 day of June, 19 55
by serving a copy of the within on
Jessie P. Bradford
RAY D. BRIDGES, Sheriff
By H. Davis D. S.

FILED

JUN 24 1959

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES

CHASON & STONE
BAY MINETTE, ALABAMA

We, the jury, find for the plaintiff, for
damages in the amount of \$10,000.

[Signature]

E. F. Sanders

F. Freeman

14 March 1961

JOHN W. JOHNSON,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	
	I	BALDWIN COUNTY, ALABAMA
FORREST C. BRADFORD and	I	
JESSIE P. BRADFORD,	I	AT LAW
Defendants.	I	

AMENDED BILL OF COMPLAINT

Comes the Plaintiff in the above styled cause and amends his complaint heretofore filed in said cause by adding "COUNT TWO" as follows:

COUNT TWO

The Plaintiff claims of the Defendants the sum of One Thousand Five Hundred Dollars (\$1,500.00) as damages for that on, to-wit: March 6, 1959, the Defendant Forrest C. Bradford, acting by and through his agent, servant or employee, Jessie P. Bradford, who was then and there acting within the line and scope of his employment as such, at a point on U. S. Highway 31, about two miles Northeast of Stapleton, Baldwin County, Alabama, negligently drove an automobile into, upon or against a pick-up truck which was then and there owned by the Plaintiff and which was being driven by him along such highway at such time and place and as a proximate result of the negligence of the Defendants his pick-up truck was almost completely demolished, all to the damages to the Plaintiff in the sum above mentioned, hence this suit.

Filed
8/5/59


Attorneys for Plaintiff

3883

JOHN W. JOHNSON,
Plaintiff,

vs.

FORREST C. BRADFORD ET AL.,
Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

AMENDED BILL OF COMPLAINT

FILED

AUG 5 1959

ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

JOHN W. JOHNSON,
Plaintiff,

-VS-

FORREST C. BRADFORD and
JESSIE P. BRADFORD,

Defendants.

: IN THE CIRCUIT COURT OF
: BALDWIN COUNTY, ALABAMA.

: AT LAW

: CASE NO. 3883

Comes now Defendant, Forrest C. Bradford, and as
answer to the Complaint heretofore filed in this cause enters
the following separate and several pleas.

PLEA ONE

Not guilty.

PLEA TWO

The allegations of the Complaint are untrue.

Cecil B. King
Cecil B. King, Attorney for
Defendant, Forrest C. Bradford.
533 First National Bank Building
Mobile, Alabama

Filed 11-3-60
Cliff H. H. H.
clerk