

DAVID BARK
ATTORNEY AT LAW
310 SOUTH BROAD STREET
MOBILE, ALABAMA
August 10, 1959

3907

Clerk, Circuit Court of Baldwin County
Court House
Bay Minette, Alabama

Re: Edward R. Johnson vs
Doris E. Lawrence

Dear Sir:

As attorney for Doris E. Lawrence I enclose my demurrer to the complaint of the plaintiff, Edward R. Johnson.

I do not have your case number.

Please acknowledge receipt of this answer and advise me when these demurrers are to be ruled on.

Your cooperation will be appreciated.

Very truly yours,

David S. Bark

David Bark

encl.
DB/esb

Answer
FILED
AUG 12 1959
ALICE L. DUCK, CLERK
REGISTER

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

JOHN CHASON
NORBORNE C. STONE, JR.

PHONE 3641

August 12, 1959

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

Dear Mrs. Duck:

Re: Edward R. Johnson vs.
Doris E. Lawrence

The above case has been settled between the parties and we have requested that the court costs be mailed to you. We presume that you have received the check for such costs.

Will you please have this case dismissed.

Yours very truly,

CHASON & STONE

By: 

JC:bw

July 24, 1959

EDWARD R. JOHNSON, Plaintiff
VS
DORIS E. LAWRENCE, Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA AT LAW

CASE NO. Not Given

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW:

I, Bettye Frink, Secretary of State, hereby certify that on
I sent by registered mail in an envelope addressed as follows:

July 21, 1959

"Doris E. Lawrence
2603 W. Scott Street
Pensacola, Florida"

"Registered Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

"Doris E. Lawrence
2603 W. Scott Street
Pensacola, Florida"

You will take notice that on July 21, 1959 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: EDWARD R. JOHNSON, Plaintiff VS DORIS E. LAWRENCE, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. Not Given a true copy of which summons and complaint is attached hereto and the said service upon me as Secretary of State of the State of Alabama has the force and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 21
day of July 1959

Enclosure (1)

(Signed) Bettye Frink
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed as above set forth had attached to it a true copy of the summons and complaint in the above-styled cause.

I further certify that on July 24, 1959 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Pensacola, Fla.
on Jul 23 1959

WITNESS MY HAND and the Great Seal of the State of Alabama this the 24 day
of July 1959

Bettye Frink
Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Honorable John Chason
Chason & Stone
Attorneys at Law
Arcade Building
Bay Minette, Alabama

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 Doris E. Lawrence 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 Edward R. Johnson.

Witness my hand this 18 day of July, 1959.

Walter J. Luck
Clerk

EDWARD R. JOHNSON,

Plaintiff,

vs.

DORIS E. LAWRENCE,

Defendant.

I
I
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 Two Thousand Five Hundred Dollars (\$2,500.00) as damages for, that on heretofore to-wit: July 22, 1958, at a point on U. S. Highway 90, in Baldwin County, Alabama, a short distance West of the Alabama-Florida line, the Defendant negligently drove a motor vehicle into, upon or against an automobile owned by the Plaintiff that he was then and there driving along such highway and as a proximate result of the negligence of the Defendant the Plaintiff's vehicle was damaged in this: its left fenders were damaged, the left side of the body was bent and torn, the windshield was broken, the left doors were damaged the left wheels were damaged, the panel was bent and its frame was knocked out of line and the Plaintiff was caused to lose the use of

his vehicle for several days, all to the damage of the Plaintiff in the above mentioned sum, hence this suit.

Shaw & Stone
Attorneys for Plaintiff

Plaintiff demands a trial of this cause
by jury.

Shaw & Stone
Attorneys for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

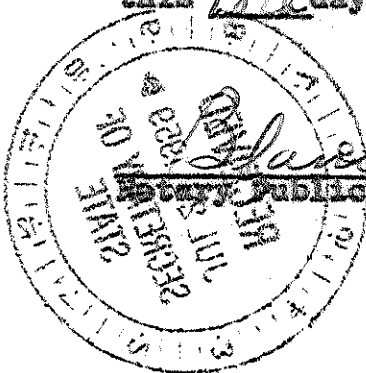
RECEIVED
JUL 18 1959
CLERK OF COURT

Before me, *Blanche White*, a Notary Public, in and for said County in said State, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is John Chason and he is one of the attorneys of record for the Plaintiff in the above styled cause; that the Defendant is a non-resident of the State of Alabama, and according to information furnished affiant, her postoffice address is 2603 W. Scott Street, Pensacola, Florida. That it is necessary that service be had on such Defendant in accordance with Title 7, Section 199 of the 1940 Code of Alabama, as amended.

John Chason

Sworn to and subscribed before me on
this 18th day of July, 1959.



Blanche White
Notary Public, Baldwin County, Alabama

EDWARD R. JOHNSON,
Plaintiff

VS

DORIS E. LAWRENCE,
Defendant

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

DEMURRER

Now comes the Defendant and demurs to the complaint heretofore filed in the above styled cause and to each count thereof separately and severally, and as grounds of demurrer, sets down and assigns the following separately and severally.

1- For that no cause of action is stated against the defendant.

2- For that no facts are alleged which sufficiently state a cause of action against this defendant.

3- For that no facts are alleged sufficient to show that the plaintiff sustained any damage.

4- For that it does not appear with sufficient certainty wherein defendant violated any duty he may have owed to the plaintiff.

5- It does not appear that plaintiff was where he had a right to be.

6- A duty owing by defendant to the plaintiff and a breach thereof is not averred with sufficient certainty.

David Bark
Attorney for Defendant

I hereby certify that I have this day mailed a copy of the foregoing demurrers to Honorable John Chason, Bay Minette, Alabama, attorney for the plaintiff.

This day of August, 1959

FILED

AUG 12 1959

ALICE J. DUCK, CLERK
REGISTERS

David Bark
Attorney for Defendant

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 Doris E. Lawrence 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 Edward R. Johnson.

Witness my hand this 18 day of July, 1959.

Walter D. Luck
Clerk

EDWARD R. JOHNSON,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	
	I	BALDWIN COUNTY, ALABAMA
DORIS E. LAWRENCE,	I	
Defendant.	I	AT LAW
	I	
	I	

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Two Thousand Five Hundred Dollars (\$2,500.00) as damages for, that on heretofore to-wit: July 22, 1958, at a point on U. S. Highway 90, in Baldwin County, Alabama, a short distance West of the Alabama-Florida line, the Defendant negligently drove a motor vehicle into, upon or against an automobile owned by the Plaintiff that he was then and there driving along such highway and as a proximate result of the negligence of the Defendant the Plaintiff's vehicle was damaged in this: its left fenders were damaged, the left side of the body was bent and torn, the windshield was broken, the left doors were damaged the left wheels were damaged, the panel was bent and its frame was knocked out of line and the Plaintiff was caused to lose the use of

his vehicle for several days, all to the damage of the Plaintiff in the above mentioned sum, hence this suit.

James A. Stone
Attorneys for Plaintiff

Plaintiff demands a trial of this cause
by jury.

James A. Stone
Attorneys for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, *Blanche White*, a Notary Public, in and for said County in said State, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is John Chason and he is one of the attorneys of record for the Plaintiff in the above styled cause; that the Defendant is a non-resident of the State of Alabama, and according to information furnished affiant, her postoffice address is 2603 W. Scott Street, Pensacola, Florida. That it is necessary that service be had on such Defendant in accordance with Title 7, Section 199 of the 1940 Code of Alabama, as amended.

John Chason

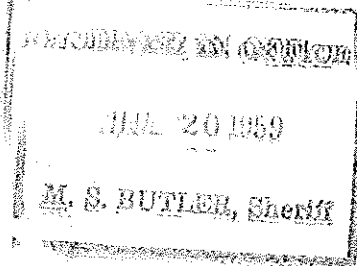
Sworn to and subscribed before me on
this 18th day of July, 1959.

Blanche White
Notary Public, Baldwin County, Alabama

FILED
JUL 18 1959

ALICE J. DUCK, Clerk

1130



3

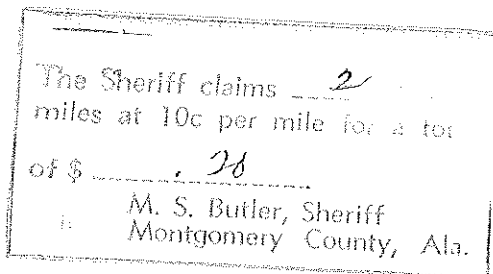
Executed by serving 3 copies of
the within on Betty Clark
Secretary of State of The State of
Alabama.

This the 11 day of July 1959

Sheriff of Montgomery County

M. S. Butler,

By Walker D. S.



2907

EDWARD R. JOHNSON,

Plaintiff,

vs.

DORIS E. LAWRENCE,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED

JUL 18 1959

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

February 12th, 1960

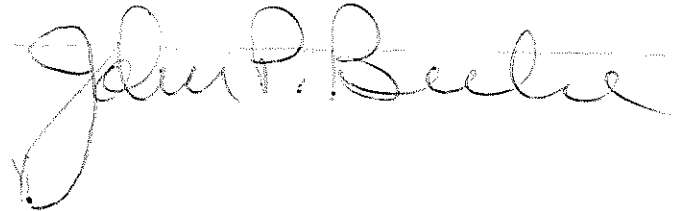
Mrs. Alice J. Duck, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

Dear Mrs. Duck:

Re: Marshall vs. Hubbart

I enclose plea in behalf of the defendant to be filed
in the above pending civil case. A copy of this plea has been
mailed by me to the opposing counsels.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".

JOHN P. BEEBE
ATTORNEY AT LAW
~~ROBERTSDALE, ALA.~~
Robertsdale, Ala.

August 8th, 1959.

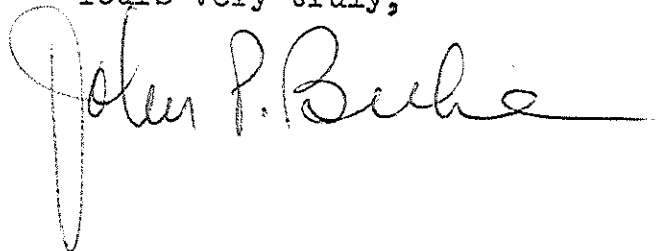
Mrs. Alice J. Duck, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

Re: Otis Marshall vs. Robert A. Hubbard

Dear Mrs. Duck:

There is enclosed demurrers to be filed in the above entitled cause. You will note that a jury is requested. I have this day mailed to Messrs. Wilters & Brantley, attorneys for the plaintiff, a copy of these demurrers, at Robertsdale, Alabama.

Yours very truly,



EDWARD R. JOHNSON VS DORIS E. LAWRENCE	
# 1 - INSTRUCTIONS TO DELIVERING EMPLOYEE	
<input type="checkbox"/> Deliver ONLY to addressee	<input type="checkbox"/> Show address where delivered
(Additional charges required for these services)	
Not Given	
RETURN RECEIPT	
Received the numbered article described on other side	
SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)	
Doris E. Lawrence	
SIGNATURE OF ADDRESSEE'S AGENT IF ANY	
DELIVER TO ADDRESSEE ONLY	
DATE DELIVERED	ADDRESS WHERE DELIVERED (if requested in item # 1)
APR 23 1959	
CBS - 16-57544-4 GPO	

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID
RETURN OF POSTAGE, \$300

TO
MONTGOMERY, ALA.

REGISTERED MAIL
RECEIVED
JUL 24 1959
SECRETARY OF STATE
MONTGOMERY, ALABAMA

INSTRUCTIONS: Fill in items below and place on other side when applicable. Numbered gummed ends and attach to back of article. Return Receipt must be placed on front of article before mailing.

REGISTERED NO.
50323

NAME OF SENDER
SECRETARY OF STATE
MONTGOMERY, ALABAMA

STREET AND NO.

CITY, ZONE AND STATE

INSURED NO.

3811

FOR FORM 3811