

JOHN A. CRESTMAN as father
and next friend of Cornelia
Crestman,

Plaintiff,

- VS -

HUBERT HARVILLE,

Defendant.

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

3920


Comes the Defendant and offers the following demurrers
to the Plaintiff's complaint, and says:

1. That said complaint does not show a matter calling
for equitable remedies.
2. That Plaintiff has an adequate remedy at law.
3. That said complaint does not allege facts showing
Plaintiff entitled to any recovery.
4. Said complaint does not show Cornelia Crestman to
be an infant.


E. G. RICKABY,
Attorney for Defendant.


KENNETH COOPER,
Attorney for Defendant.

Filed
8-18-59

Copy handed PLAT


STATE OF ALABAMA
BALDWIN COUNTY

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 JOHN A. CRESTMAN as father and next friend of Cornelia Crestman.

WITNESS MY hand this 28 day of July, 1959.

Alice J. Duck
Clerk

JOHN A. CRESTMAN as father
and next friend of Cornelia

Crestman,

PLAINTIFF

VS

HUBERT HARVILLE

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA;

IN EQUITY

1.

The Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND (\$15,000.00) DOLLARS as damages for that on, to-wit: January 30, 1959, at a point on U. S. Highway 31, two miles North of Stapleton in Baldwin County, Alabama, the Defendant negligently drove his automobile into, upon or against the automobile in which Cornelia Crestman was riding at said time and place and where she had a right to be and as a direct proximate consequence and result of the negligence of said Defendant the said Cornelia Crestman was injured in this: her face and body was lacerated; her left leg was broken; she was caused to suffer abrasions and contusions and she was caused to suffer much pain and anguish. She was caused to incur large hospital and medical bills, all to the loss of the Plaintiff in the aforesaid amount, hence this suit.

Wilters & Brantley

BY: Walter M. Brantley

Attorneys for the Plaintiff

The Plaintiff demands a trial by jury.

Wilters & Brantley

BY: Walter M. Brantley

Attorneys for the Plaintiff

FILED

JUL 28 1959

ALICE J. DUCK, Clerk

cd
1699 3920 422

Received 28 day of July 1959
and on 10 day of August 1959
served a copy of the within Bill of Complaint
on Hubert Harville
By service on Ray D. Bullock
TAYLOR WILKINS, Sheriff
By S. Smith D. S.

John A. Crestman as Father
and next friend of Cornelia
Crestman,

Plaintiff

10^{1/2} pm. vs
Hubert Harville

Defendant

Bill of Complaint

FILED

JUL 28 1959

ALICE J. DUCK, Clerk

Hubert Harville
Ray D. Bullock
TAYLOR WILKINS, Sheriff
S. Smith
Bill of Complaint
FILED
JUL 28 1959
ALICE J. DUCK, Clerk