

DOROTHY MAE DANIEL,

Plaintiff,

vs.

T.C. DOWNEY, individually  
and doing business as  
DOWNEY'S TAXI,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

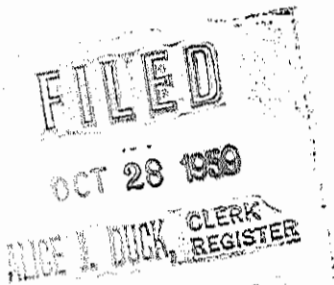
AT LAW

NO.

4012

Comes now the Defendant, by his attorney, and for answer  
to the Complaint heretofore filed in this cause, says:

1. Not guilty.



*James Owens Jr.*  
Attorney for the Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW NO. 4012.

DOROTHY MAE DANIEL,  
Plaintiff,

vs.

T.C. DOWNEY individually  
and doing business as  
DOWNEY'S TAXI,

Defendant.

ANSWER

FILED  
OCT 28 1959  
ALICE J. DUCK, CLERK  
REGISTER

LAW OFFICES OF  
J. CONNOR OWENS, JR.  
101 COURTHOUSE SQUARE  
BAY MINETTE, ALABAMA

- ~~1. [Name], [Address], [Occupation], [Location]~~  
~~2. [Name], [Address], [Occupation], [Location]~~  
~~3. [Name], [Address], [Occupation], [Location]~~  
4. Helms, John R., Civil Service, Elberta  
~~5. [Name], [Address], [Occupation], [Location]~~  
~~6. [Name], [Address], [Occupation], [Location]~~  
~~7. [Name], [Address], [Occupation], [Location]~~  
~~8. [Name], [Address], [Occupation], [Location]~~  
~~9. [Name], [Address], [Occupation], [Location]~~  
~~10. [Name], [Address], [Occupation], [Location]~~  
~~11. [Name], [Address], [Occupation], [Location]~~  
~~12. [Name], [Address], [Occupation], [Location]~~  
13. Harrison, John, Laborer, Summerdale  
~~14. [Name], [Address], [Occupation], [Location]~~  
~~15. [Name], [Address], [Occupation], [Location]~~  
~~16. [Name], [Address], [Occupation], [Location]~~  
~~17. [Name], [Address], [Occupation], [Location]~~  
18. Pilgrim, A.L., Farmer, Elberta  
19. Pilgrim, H.E., Farmer, Elberta  
~~20. [Name], [Address], [Occupation], [Location]~~  
~~21. [Name], [Address], [Occupation], [Location]~~  
~~22. [Name], [Address], [Occupation], [Location]~~  
~~23. [Name], [Address], [Occupation], [Location]~~  
~~24. [Name], [Address], [Occupation], [Location]~~  
25. Chestang, Pelham D., Brookley Field, Bay Minette  
~~26. [Name], [Address], [Occupation], [Location]~~  
~~27. [Name], [Address], [Occupation], [Location]~~  
~~28. [Name], [Address], [Occupation], [Location]~~  
29. Cleverdon, Paul L., Farmer, Summerdale  
~~30. [Name], [Address], [Occupation], [Location]~~  
31. Armstrong, William, Civil Service, Elberta  
32. Williams, Bryant, Farmer, Fairhope  
~~33. [Name], [Address], [Occupation], [Location]~~  
34. Walters, Thomas W., Farmer, Bon Secour  
~~35. [Name], [Address], [Occupation], [Location]~~  
36. Crull, Calvin, Creamery, Fairhope  
~~37. [Name], [Address], [Occupation], [Location]~~  
38. Fell, Walter, Mechanic, Bon Secour  
39. Flowers, Albert T., Farmer, Gulf Shores  
40. Ford, W.B., Jr., Type Setter, Foley  
~~41. [Name], [Address], [Occupation], [Location]~~  
~~42. [Name], [Address], [Occupation], [Location]~~  
~~43. [Name], [Address], [Occupation], [Location]~~  
~~44. [Name], [Address], [Occupation], [Location]~~  
~~45. [Name], [Address], [Occupation], [Location]~~  
~~46. [Name], [Address], [Occupation], [Location]~~  
~~47. [Name], [Address], [Occupation], [Location]~~  
~~48. [Name], [Address], [Occupation], [Location]~~  
~~49. [Name], [Address], [Occupation], [Location]~~

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D XXXXX XXXXX

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 T. C. Downey, individually and doing business as Downey's Taxi, 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 Dorothy Mae Daniel.

Witness my hand this 17 day of October, 1959.

Alice J. Duck  
Clerk

DOROTHY MAE DANIEL,

Plaintiff,

vs.

T. C. DOWNEY, individually  
and doing business as DOWNEY'S  
TAXI,

Defendant.

Y

Y

Y

Y

Y

Y

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

4012 AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of Ten Thousand Dollars (\$10,000.00) for that heretofore on, to-wit: the 24th day of December 1958, at about 4:15 P. M. the Defendant so negligently operated an automobile at the intersection of D'Olive Street and Dobson Avenue in the City of Bay Minette, Alabama, a public road in Baldwin County, Alabama, as to cause or to allow the same to run into upon and against an automobile in which the Plaintiff was riding as a passenger and as a proximate consequence and result of the negligence of the Defendant, aforesaid, the Plaintiff was seriously and permanently injured in this: her hip was broken, her pelvis was crushed, her forehead was cut, she suffered fractured ribs, she sustained internal injuries, she received bruises over most of her body, she was made sick, sore and lame, she suffered and continues to suffer

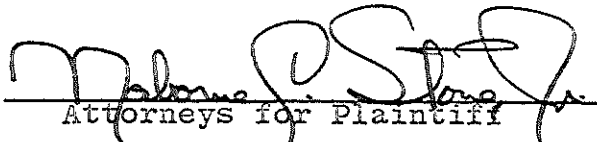
great pain and mental anguish, she has been permanently scarred, disfigured and crippled, she was caused to be confined to a hospital for several weeks and to her home for several months and she incurred hospital and doctor bills in caring for and treating her said injuries, and she lost much time from her work, all as a result of the negligence of the Defendant, aforesaid, wherefore she brings this suit and asks judgment in the above amount.

CHASON & STONE

By:   
Attorneys for Plaintiff

Plaintiff demands a trial of this  
cause by jury.

CHASON & STONE

By:   
Attorneys for Plaintiff

FILED

OCT 17, 1959

ALICE J. DUCK, Clerk

Received 17 day of Oct 1959  
and on 17 day of Oct 1959  
served a copy of the within 2 cc  
on J. C. Downey

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Talbert D. S.  
ami

We the jury find for  
the Plaintiff in the  
amount of \$2500<sup>00</sup>

Paul L. Chason  
For

Dorothy Mae Daniel  
vs

J. C. Downey Ind  
& d/b/a Downey's Taxi

FILED  
OCT 17 1959

ALICE J. DUCK, Clerk

LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA