

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 Rosie Pearl Jenkins.

Witness my hand this 17 day of October, 1959.

Oliver J. Duck
Clerk

ROSIE PEARL JENKINS,

Plaintiff,

vs.

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

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The Plaintiff claims of the Defendant the sum of Three Thousand Dollars (\$3,000.00) 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 shoulder was injured, her chin was cut, three of her teeth were broken and had to be removed, her leg was bruised, her right hip was bruised, she was caused to lose time from her work and she was caused to incur hospital, dental and


doctor bills in treating and caring for her said injuries, 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

Rosie Pearl Jenkins

vs

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

Received 17 day of Oct 1959
and on 19 day of Oct 1959
served a copy of the within A & C
on V. C. Downey

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Tolbert D. S.

omi

FILED

OCT 17 1959

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

ROSIE PEARL JENKINS,
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. _____

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

1. Not guilty.

FILED

OCT 28 1959

ALICE J. DUCK, CLERK
REGISTER

James C. Denny, Jr.
Attorney for Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW NO. 4013

ROSIE PEARL JENKINS,
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

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 COURT HOUSE SQUARE
BAY MINETTE, ALABAMA

Nov. 18, 1959

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

Dear Mrs. Duck:

Enclosed are notices of the taking of the depositions of
Hayward Huffman, Rosie Pearl Jenkins, Leo Daniels and
Dorothy Mae Daniels, all plaintiffs in cases against
T. C. Downey, said cases pending in the Circuit Court.

Will you please issue subpoenas for each of them to
appear as set forth in the enclosed notices.

Sincerely yours,


J. Connor Owens, Jr.

ROSIE PEARL JENKINS,

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. 4013.

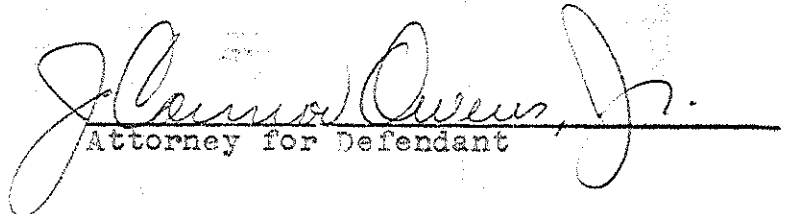
NOTICE OF DEPOSITION

TO: MESSRS. CHASON AND STONE, ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

You are hereby notified that the Defendant in the above styled cause will take the pretrial discovery deposition of Rosie Pearl Jenkins, whose residence is Bay Minette, Alabama, on Thursday, December 3, 1959, at 10:00 A.M., said deposition to be taken before Mrs. Louise Dusenbury, in the Courthouse at Bay Minette, Baldwin County, Alabama, and will be continued from day to day until completion of the same.

The foregoing deposition shall be taken in accordance and under the provisions of Act No. 375 of the Alabama Legislature of 1955, as amended.

You are invited to attend and cross-examine.


Attorney for Defendant