

HAYWARD HUFFMAN,

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. 4014

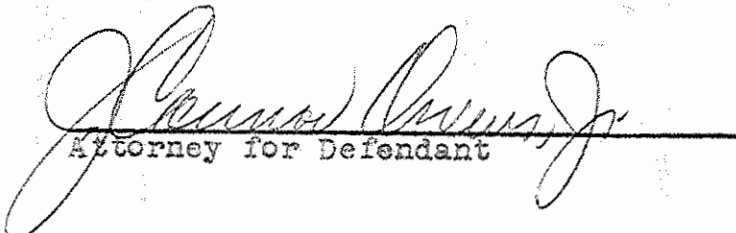
NOTICE OF DEPOSITION

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 Hayward Huffman, 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

HAYWARD HUFFMAN,

Plaintiff,

vs.

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

Defendant.

IN THE CIRCUIT COURT OF

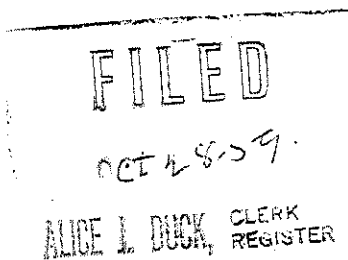
BALDWIN COUNTY, ALABAMA,

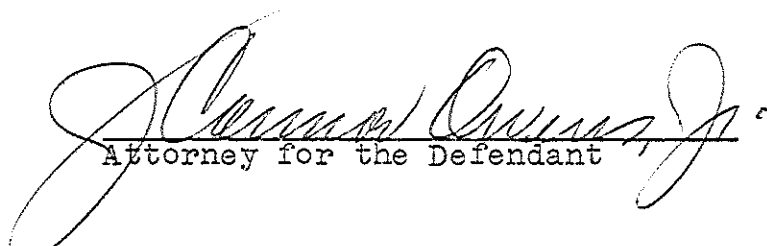
AT LAW

NO. \_\_\_\_\_

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

1. Not guilty.



  
Attorney for the Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

AT LAW NO. 4014.

HAYWARD HUFFMAN,

Plaintiff,

vs.

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

Defendant.

ANSWER

FILED  
OCT 28 1950  
ALICE L. DUCK, CLERK  
REGISTER

LAW OFFICES OF  
J. CONNOR OWENS, JR.  
101 COURTHOUSE SQUARE  
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 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 Hayward Huffman.

Witness my hand this 17 day of October, 1959.

Alissa J. Duck  
Clerk

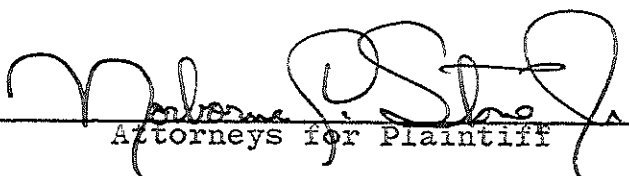
HAYWARD HUFFMAN,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
T. C. DOWNEY, individually	X	
and doing business as	X	AT LAW
DOWNEY'S TAXI,	X	4014
Defendant.	X	

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) for, that heretofore, on to-wit: the 24th day of December 1958, at about 4:15 o'clock 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: he was knocked unconscious for about two hours, his face and eyes were cut and bruised, he lost a great amount of time from his work and he was caused to incur hospital and doctor bills in caring for his said injuries, all to his damage aforesaid, wherefore he brings this suit and asks judg-


ment 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

Wayward Hayman

vs

J. C. Downey ind &  
Abba Downey's Taxi

ved 17 day of Oct 1959  
on 19 day of Oct 1959  
ved a copy of the within J. C. Downey

service on

TAYLOR WILKINS, Sheriff  
By W. A. Talbot D. S.  
omi

FILED

OCT 17 1959

ALICE J. DUCK, Clerk

LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA