

MOBILE CORPS OF THE
SALVATION ARMY, A Corporation,

Plaintiff,

VS.

JAMES H. MEADOWS,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 4045

PLEA IN ABATEMENT

Comes now the Defendant in the above styled cause, and says:
That the suit should be abated, and for grounds therefor says:

1. That this court has no jurisdiction of the subject matter of the action for the reason that the bill of complaint affirmatively shows on its face that the accident complained of did not occur within the jurisdiction of this court.

2. That the bill of complaint does not allege that the Defendant is a resident of this County, hence this suit should be abated.

[Signature]
Attorney for Defendant

FILED
4-21 1960
ALICE J. DOCK, CLERK
REGISTER

STATE OF ALABAMA,
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

Your are hereby commanded to summon JAMES H. MEADOWS 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 the MOBILE CORPS OF THE SALVATION ARMY, a Corporation.

Witness my hand this the 6th day of November, 1959.

Alice J. Duck
CLERK

MOBILE CORPS OF THE
SALVATION ARMY, A Corporation,
Plaintiff,
VS.
JAMES H. MEADOWS,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 4045

C O U N T O N E

The plaintiff claims of the defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS, as damages, for that, heretofore, on, to-wit: the 4th day of December, 1958, at about 11:15 o'clock, A. M., at the intersection of Pine Street and Old Shell Road, which are public streets in the City of Mobile, Alabama, the defendant so negligently operated an automobile which he was then and there driving as to cause, permit or allow the same to run into, upon or against a pick-up truck belonging to the plaintiff and as a proximate consequence thereof, plaintiff's said pick-up truck was severely damaged in this: the front and left side was bent, broken and damaged; the front bumper was badly bent; the frame was bent; the front grill was severely damaged; the left front fender was badly bent; the left front headlight and parking light was broken; the hood was bent and broken; the steering columns and system was bent and broken; and the plaintiff was deprived of the use of said pick-up truck, which was used in its business, for a long period of time; all to the damage of the plaintiff as aforesaid; hence this suit.

Jeffrey H. Maslowski
ATTORNEY FOR PLAINTIFF.

Plaintiff demands a jury trial of this cause.

1

Jeffrey H. Maslowski
ATTORNEY FOR PLAINTIFF

FILED

NOV 6 1959

ALICE J. DUCK, Clerk

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 4045

MOBILE CORPS OF THE
SALVATION ARMY, A
Corporation,

Plaintiff,

VS.

JAMES H. MEADOWS,

Defendant.

FILED

NOV 6 1959

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

TELFAIR J. MASHBURN, JR.

ATTORNEY-AT-LAW

BAY MINETTE, ALABAMA

Defendant lives in Fairhope

address

Quincy Service, etc.

Received 28 day of Feb 1960
and on 21 day of March 1960
served a copy of the within R & C
in James H. Meadows
by service on _____

TAYLOR WILKINS, Sheriff

By Statham D. S.

Returned 15 day of Dec
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

By Statham
Deputy Sheriff

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Taylor Wilkins
DEPUTY SHERIFF

Fairhope, Ala

MOBILE CORPS OF THE SALVATION
ARMY, A Corporation,

Plaintiff,

VS.

JAMES H. MEADOWS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 4045

DEMURRER

Comes now the Plaintiff in the above styled cause and demurs to the Plea in Abatement heretofore filed in said cause by the defendant, and, for grounds of demurrer, sets down and assigns, separately and severally, the following;

1. That said Plea is not verified.
2. That, from aught that appears in said plea in abatement, defendant is a resident of Baldwin County, Alabama.

FILED

MAY 6 1960

ALICE J. DUCK, Clerk.

John A. Mosley
ATTORNEY FOR PLAINTIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 4043

MOBILE CORP~~SE~~ OF THE SALVATION
ATMY, A Corporation,

Plaintiff,

VS.

JAMES H. MEADOWS,

Defendant.

DEMURRER TO REEA.

FILED

MAY 6 1960

ALICE J. DUCK, Clerk

MOBILE CORPS OF THE
SALVATION ARMY

Plaintiff

VS

JAMES H. MEADOWS

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

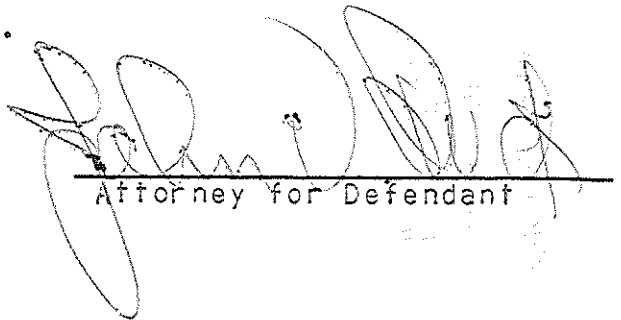
AT LAW:

PLEA

Comes now the Defendant in the above styled cause, and
for Plea to the said Bill of Complaint filed herein, says:

COUNT I.

Not Guilty.



Attorney for Defendant

FIL D

JUL 27 1960

ALICE J. DUCK, Clerk

4045

FILED

JUL 27 1960

ALICE J. DUCK, Clerk