

ROBERT B. WASHBURN,  
Plaintiff,  
-Vs-  
ARNOLD L. CHANDLER,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NO. 4531

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE THOUSAND AND NO/100 (\$5,000.00) DOLLARS as damages, for that heretofore and on, to-wit, November 12, 1960, the Defendant so negligently operated an automobile on U. S. Highway 90 on Mobile Bay Bridge Causeway at a point to-wit, one-half (1/2) mile West of the intersection of the said U. S. Highway 90 and U. S. Highway 31 both of said highways being public roads in Baldwin County, Alabama so as to cause said vehicle to then and there collide with the automobile in which the Plaintiff was riding as a passenger on said U. S. Highway 90 and as a proximate result of the negligence of the Defendant as aforesaid the Plaintiff was greatly injured in this, to-wit: He was made sick, sore and lame; he suffered multiple abrasions and contusions about his head, face and body; he suffered severe mental and physical pain and anguish; he was caused to lose time from his employment, for all of which he claims damages as aforesaid.

*Robert T. Cunningham*  
ROBERT T. CUNNINGHAM  
*Richard Bounds*  
RICHARD BOUNDS  
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

*Richard Bounds*

Address of Defendant:  
Silver Hill, Alabama

ROBERT E. WASHBURN,

Plaintiff,

vs.

ARNOLD L. CHANDLER,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO.4531

DEMURRER:

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That the place where the accident occurred is not sufficiently set out in the complaint.
3. That said complaint claims damages for loss of time from employment but does not allege that the Plaintiff was employed at the time of the accident.
4. That said complaint does not allege how much time the Plaintiff lost from his employment.

*Chason & Stone*  
Chason & Stone

*R. F. Adams*  
R. F. Adams

Attorneys for Defendant



DEMURRER

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ROBERT E. WASHBURN,  
Plaintiff,  
vs.  
ARNOLD D. CHANDLER,  
Defendant.

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 4531

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FILED  
JAN 31 1961  
ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4531

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

ARNOLD L. CHANDLER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

ARNOLD L. CHANDLER

, Defendant

by ROBERT B. WASHBURN

, Plaintiff

Witness my hand this 30 day of December 19 60

, Clerk

No. 4531

Page

**STATE of ALABAMA**

Baldwin County

**CIRCUIT COURT**

ROBERT B. WASHBURN

Plaintiffs

vs.

ARNOLD L. CHANDLER

Defendants

**Summons and Complaint**

Filed December 30, 1960

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

12-30-, 1960

Sheriff.

I have executed this summons

this 1-12 1961

by leaving a copy with

Arnold L. Chandler

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY

Edleigh Steadham  
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Edleigh Steadham

Deputy Sheriff.

Silverhill, Ala

ROBERT B. WASHBURN,

Plaintiff,

vs.

ARNOLD L. CHANDLER,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4531

Comes the Defendant in the above styled cause and for plea  
to the complaint filed in said cause says:

1. Not guilty.

FILED

JUL 21 1961

ALICE J. DUCK, CLERK  
REGISTER

*James A. Stone*

*R. F. Adams*

Attorneys for Defendant

ROBERT B. WASHBURN,  
Plaintiff,

vs.

ARNOLD L. CHANDLER,  
Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW NO. 4531

\* \* \* \* \*

PLEA

\* \* \* \* \*

FILED

JUL 21 1961

ALICE J. DUCK, CLERK  
REGISTER

CUNNINGHAM AND BOUNDS

ATTORNEYS AT LAW

1350 DAUPHIN STREET

P. O. BOX 4483

MOBILE, ALABAMA

January 24, 1962

ROBERT T. CUNNINGHAM  
RICHARD BOUNDS

HEMLOCK 8-6188

Clerk of Circuit Court  
County Court House  
Bay Minette, Alabama

Re: Robert B. Washburn v. Arnold L. Chandler  
Case No. 4531

Dear Sir:

Will you please dismiss the above cause on motion of  
the Plaintiff and send your bill for costs to Mr. Robert  
F. Adams, attorney for the Defendant?

This case has been settled.

Very truly yours,

CUNNINGHAM & BOUNDS

*Richard Bounds*

RICHARD BOUNDS *law.*

RB/baw

cc/ Mr. Robert F. Adams  
P. O. Box 1070  
Mobile, Alabama