

ERNEST E. GATES,

Plaintiff,

vs.

MRS. LOUISE CHILDRESS
and TONY RAY HAMMAC,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

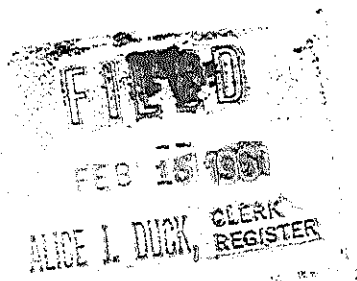
AT LAW

DEMURRER

Come the Defendants in the above styled cause and demur to the complaint filed in said cause and assign 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.
3. That the damages to the Plaintiff's vehicle are not sufficiently set out.

Sharon & Stone
Attorneys for Defendants



4556

ERNEST E. GATES,

Plaintiff,

vs.

MRS. LOUISE CHILDRESS and
TONY RAY HAMMAC,

Defendants

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

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DEMURRER

* * * * *

FILED
FEB 15 1981
AUGIE J. DUCK, CLERK
REGISTER

COMPLAINT

ERNEST E. GATES,

PLAINTIFF

VS

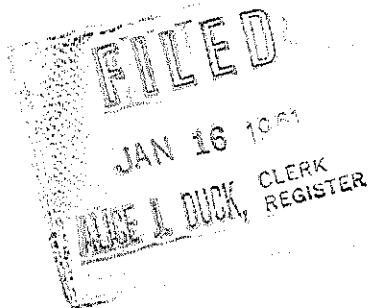
MRS. LOUISE CHILDRESS AND TONY
RAY HAMMAC,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Plaintiff claims of the Defendants the sum of One Hundred Sixty-seven and 62/100 (\$167.62) Dollars as damages heretofor on, to-wit: the 14th day of March 1960, the Defendant, Tony Ray Hammac, while acting within the line and scope of his employment as agent, servant or employee of the Defendant, Mrs. Louise Childress, so negligently operated a motor vehicle owned by the Defendant, Mrs. Louise Childress, south on College Street in the Town of Robertsdale, Baldwin County, Alabama, so as to cause or allow said vehicle to collide with a motor vehicle owned by the Plaintiff and being operated by Harlan James westwardly on Second Street, where he had a lawful right to be and as a direct and proximate result of the negligence of the Defendants, the Plaintiffs' motor vehicle was damaged in and about the front end, for all of which Plaintiff was caused to incur expenses in the repair of his motor vehicle for all of which Plaintiff claims damages as aforesaid.


Attorney for Plaintiff



SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Mrs. Louise Childress and Tony Ray Hammac

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 _____

Mrs. Louise Childress and Tony Ray Hammac _____, Defendant S.

by Ernest E. Gates _____

_____, Plaintiff _____

Witness my hand this 16 day of June 1961

Ernest E. Gates, Clerk

No. 4534

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Ernest E. Gates

Plaintiffs

vs.

Mrs. Louise Childress and

Tony Ray Hammac

Defendants

Summons and Complaint

FILED

Filed

19

JAN 16 1961

ALICE J. DUCK, CLERK
REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

2-10-61

Defendant lives at

Robertsdale, Alabama

Received In Office

1-16, 1961

Sheriff.

I have executed this summons

this 2-10 1961

by leaving a copy with

Mrs Louise Childress
Tony Ray Hammac

Sheriff claims 80 miles at

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Edleigh Steadham

Deputy Sheriff.

Loxley, Ala