

BEUNA IRENE BROOKS,) IN THE CIRCUIT COURT OF
Plaintiff) BALDWIN COUNTY, ALABAMA
Vs.) AT LAW
JOSEPH B. E. BROWN,) CASE NO. 4426
Defendant)

A N S W E R

Comes now the defendant in the above styled cause and for answer to the complaint heretofore filed and each count thereof, separately and severally, interposes the following separate and several pleas in answer thereto:

ONE

Not guilty.

TWO

The material allegations thereof are untrue.

THREE

At the time and place complained of in the complaint an agent, servant or employee of the plaintiff, while acting within the line and scope of her agency, service or employment as such, did so negligently operate an automobile in an easterly direction along U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point thereon, to-wit, the Apalachee River Bridge, as to cause or allow same to come into contact with the automobile then and there being driven by the defendant, and as a direct and proximate result and consequence of said negligence the plaintiff contributed to

the injuries and damages complained of by her, and hence she ought not recover.

W.C. Boone Jr
Attorney for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant respectfully demands a trial of this cause by jury.

W.C. Boone Jr
Attorney for Defendant

FILED
DEC 20 1960
ALICE J. DUCK, Clerk

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOSEPH B. E. BROWN to appear within thirty days from the service of this writ in the Circuit Court of said county at the place of holding same, then and there to answer the complaint of BUENA IRENE BROOKS.

WITNESS my hand this 12 day of September, 1960.

Alice J. Duck
Clerk of the Circuit Court

Defendant's address is
River Route, Magnolia Springs,
Alabama.

FILED

SEP 12 1960

ALICE J. DUCK, CLERK
REGISTER

EA-12-6-60

BUENA IRENE BROOKS,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
JOSEPH B. E. BROWN,) AT LAW
Defendant.)

COMPLAINT

The plaintiff claims of the defendant the sum of NINE THOUSAND FIVE HUNDRED DOLLARS (\$9,500.00) as damages for that heretofore on, to-wit, September 14, 1959, the plaintiff was a passenger in an automobile which was being driven in an easterly direction along United States Highway No. 90, a public highway, in Baldwin County, Alabama, at a point thereon, to-wit, the Apalachee River Bridge, at which time and place the defendant so negligently operated the automobile which he was driving as to cause it to run into, upon or against the automobile in which the plaintiff was riding, and as a proximate result of the defendant's said negligence plaintiff's neck and back were injured, she was made sick and sore, she has suffered and is suffering great pain and was otherwise injured, and she was caused to expend large sums of money for treatment of her said injuries, all to the damage of the plaintiff in the sum aforesaid, hence this suit.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of said
cause by jury,

J. B. Blackburn
Attorney for Plaintiff

SUMMONS AND COMPLAINT

BUENA IRENE BROOKS,

Plaintiff,

VS.

JOSEPH B. E. BROWN,

Defendant.

Received 19 day of Oct 1960

and on 6 day of Nov 1960

I served a copy of the within 24

on Joseph B. E. Brown

By service on _____

TAYLOR WILKINS, Sheriff

By Charles D. S.

Magnolia Springs

Sheriff claims 84 miles at

Ten Cents per mile Total 8.40

TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4426

FILED

SEP 12 1960

ALICE J. DUCK, CLERK
REGISTER

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Wests. Address:
Magnolia Springs, Ala