

4427

BETTY JO STANLEY,)
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 FIVE THOUSAND DOLLARS (\$5,000.00) as damages for that heretofore on, to-wit, September 14, 1959, the plaintiff was driving an automobile 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 which the plaintiff was driving, 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

BETTY JO STANLEY,

Plaintiff,

VS.

JOSEPH B. E. BROWN,

Defendant.

Received 19 day of Oct 1962
and on 6 day of Nov 1962
served a copy of the within 82 C
on Joseph B. E. Brown
by service on _____

TAYLOR WILKINS, Sheriff

By Forrest L. Adams 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. 4427

FILED

SEP 12 1960

ALICE J. DUCK, CLERK
REGISTER

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

Admitted:
Magnolia Springs

BETTY JO STANLEY,) IN THE CIRCUIT COURT OF
Plaintiff) BALDWIN COUNTY, ALABAMA
Vs.) AT LAW
JOSEPH B. E. BROWN,) CASE NO. _____
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 the plaintiff 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 of the plaintiff, 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 L. DUCK, Clerk

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

October 18, 1960

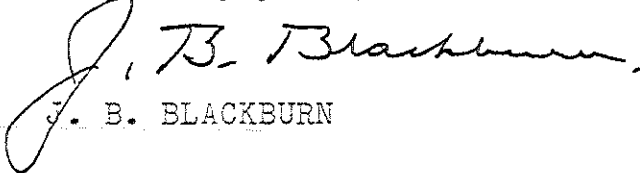
Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

On September 12 I filed the case of Buena Irene Brooks v. Joseph B. E. Brown, and the case of Betty Jo Stanley v. Joseph B. E. Brown, and asked you to withhold service because I thought the cases would be settled.

The cases have not been settled and I will appreciate your delivering the summons and complaint in each case to the Sheriff with instructions to serve them on the defendant, who resides at Magnolia Springs.

Very truly yours,


J. B. BLACKBURN

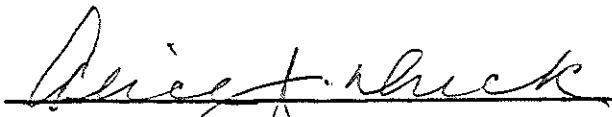
JBB*MLB

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 BETTY JO STANLEY.

WITNESS my hand this 17 day of September, 1960.


Clerk of the Circuit Court

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

FILED

SEP 12 1960

ALICE J. DUCK, CLERK
REGISTER

EX 12-6-61