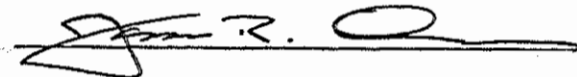


LOIS STARK CHANDLER,) IN THE CIRCUIT COURT OF
Plaintiff,)
vs.) BALDWIN COUNTY, ALABAMA
MARTIN WILLIAMSON,)
Defendant.) AT LAW.
NO. 4177.

DEMURRER:

Now comes the defendant in the above styled cause and demurs to the complaint heretofore filed in said cause and as grounds for said demurrer, assigns the following, separately and severally:

1. The complaint does not state a cause of action.
2. It does not allege with sufficient certainty where the alleged accident occurred .


Attorney for Defendant.

FILED

FEB 9 1960

ALICE J. DICK, CLERK
REGISTER

4177

FILED

FEB 9 1960

ALICE J. MARR
CLERK
REGISTERED

U.
1.
6.

LOIS STARK CHANDLER	§	IN THE CIRCUIT COURT
Plaintiff	§	OF BALDWIN COUNTY,
VS.	§	ALABAMA
MARTIN WILLIAMSON	§	CIVIL DIVISION
Defendant	§	NO. <u>4177</u>

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS for that heretofore and on, to-wit, the 7th day of November, 1959, the Defendant did so negligently operate an automotive vehicle on and along United States Highway 90, at or near the ^{East end of} Pensaw River Bridge, ^{in Baldwin Co., Ala.} said highway being a public highway in Baldwin County, Alabama, as to run upon, over or against an automobile in which the Plaintiff was riding at the time and place aforesaid, and as a direct and proximate result of the Defendant's negligence the Plaintiff received injuries to her back, her left arm, and a dislocated and bruised kidney and other injuries about her body; all for which the Plaintiff sues.

M. A. Marsal
M. A. MARSAL
Attorney for the Plaintiff

The Plaintiff demands that this case be tried by jury.

M. A. Marsal
M. A. MARSAL
Attorney for the Plaintiff

Defendant's address:

Probate Court
Baldwin County, Alabama

SUMMONS AND COMPLAINT

Moore Pr. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County.

No. 4177

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MARTIN WILLIAMSON

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-----

MARTIN WILLIAMSON

-----, Defendant.

by LOIS STARK CHANDLER

-----, Plaintiff.

Witness my hand this 5th day of February 1960.

Alice J. Luck, Clerk

No. 4177 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

LOIS STARK CHANDLER

Plaintiffs

vs.

MARTIN WILLIAMSON

Defendants

Summons and Complaint

Filed February 5, 1960

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Feb. 5 1960

_____, Sheriff

I have executed this summons

this 5 Feb 1960

by leaving a copy with

Martin Williamson

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

o mi

LOIS STARK CHANDLER,

Plaintiff,

VS.

MARTIN WILLIAMSON,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

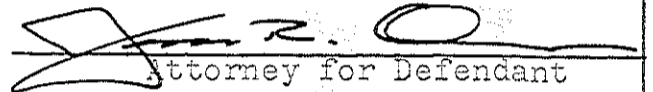
NO. 4177

PLEA

Now comes the Defendant in the above styled cause and for
plea to the amended complaint says:

1. Not guilty.

Filed
8-12-60


Attorney for Defendant

4177

FILED

AUG 12 1920

ALICE J. DUCK, CLERK
REGISTER

HARRY SEALE

LAWYER

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

HARRY SEALE

M. A. MARSAL

A. J. SEALE

LEON G. DUKE

MAILING ADDRESS:

POST OFFICE BOX 1318

HEWLOCK 2-6686

February 4, 1960

Mrs. Alice Duck
Clerk of the Circuit Court
Baldwin County, Alabama

Re: Chandler vs. Williamson

Dear Mrs. Duck:

Please find enclosed herein the original and one onion skin of a complaint that I respectfully ask to be filed in your honorable court. I would appreciate very much that the Sheriff be given a copy to serve on the Defendant.

Highest personal regards.

Yours truly,



BUBBA

MAM/ar

Enclosure