

LOIS STARK CHANDLER

Plaintiff

VS.

EUGENE HARRISON WOODS, IV

Defendant

X IN THE CIRCUIT COURT OF

X BALDWIN COUNTY, ALABAMA

X

X

X CASE NO. 4156

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 Tensaw River Bridge, said highway being a public highway in Baldwin County, Alabama, as to run upon, over or against an automobile in which the Plaintiff was a passenger 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, and she suffered extreme physical pain and mental anguish and has incurred expense in and about the treatment of her injuries; all for which the Plaintiff sues.

M. A. Marsal
M. A. MARSAL

Attorney for the Plaintiff

The Plaintiff demands that this cause be tried by jury.

M. A. Marsal
M. A. MARSAL

Defendant's Address:

Selma, Alabama

FILED

FEB 17 1960

ALICE L. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4186

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EUGENE HARRISON WOODS, IV.

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

EUGENE HARRISON WOODS, IV., Defendant

by LOIS STARK CHANDLER

Plaintiff

Witness my hand this 17 day of September 1960

Alma J. Luck, Clerk

No. 4186

Page

The State of Alabama
Baldwin County

CIRCUIT COURT

LOIS STARK CHANDLER

Plaintiffs

vs.

EUGENE HARRISON WOODS, IV.

Defendants

Summons and Complaint

Filed February 17, 1960

Alice J. Duck Clerk

Address:

417 Battery Avenue
Selma, Alabama

Plaintiff's Attorney

Defendant's Attorney

RECEIVED IN OFFICE

Defendant lives at
FEB 18 1960

JAMES G. CLARK, JR.
Received In Office Sheriff

2/17 1960

Taylor W. Clark, Sheriff

I have executed this summons

this 19th Feb. 1960

by leaving a copy with

Eugene Harrison Woods IV

James G. Clark, Jr. Sheriff

E. A. Payne Deputy Sheriff

Notary 10

Notice mailed 2/17/60

LOIS STARK CHANDLER,		IN THE CIRCUIT COURT OF
Plaintiff,		
vs.		BALDWIN COUNTY, ALABAMA
EUGENE HARRISON WOODS, IV.,		AT LAW. NO. 4186.
Defendant.		

PLEA OF MISNOMER:

Now comes Eugene Harrison Wood, IV., and shows unto the Court and your Honor that there was served upon him by the Sheriff of Dallas County, Alabama, a summons and complaint in a cause in the Circuit Court of Baldwin County, Alabama, wherein Lois Stark Chandler appears as Plaintiff, and Eugene Harrison Woods, IV., appears as Defendant.

The said Eugene Harrison Wood, IV., respectfully shows to the Court that his name is Eugene Harrison Wood, IV., and he is not now known by the name of Eugene Harrison Woods, IV., and never has been known by the name of Eugene Harrison Woods, IV.

x Eugene Harrison Wood IV

STATE OF ALABAMA)
Dallas *)
BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared Eugene Harrison Wood, IV., who first being duly and legally sworn, deposes and says: That he has read over the foregoing plea of misnomer and that the facts stated therein are true.

x Eugene Harrison Wood IV

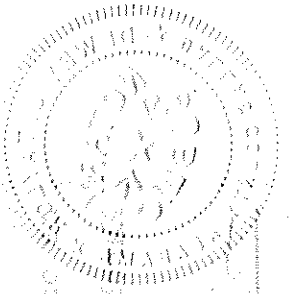
Sworn to and subscribed before
me on this the 1st day of
March, 1960.

Arvey J. Taylor
Notary Public, Baldwin County, Alabama.

JAMES R. OWEN,
Attorney for Eugene Harrison Wood, IV.

FILED
MAR 2 1960
ALICE J. DUCK, Clerk

Received for [illegible] [illegible] [illegible]



Report made by [illegible] [illegible] [illegible]

1960

Page 2

Report made by [illegible] [illegible] [illegible]

[illegible] [illegible] [illegible]

Witness and also the [illegible] [illegible] [illegible]

deposed and also [illegible] [illegible] [illegible]

deposed [illegible] [illegible] [illegible]

deposed [illegible] [illegible] [illegible]

deposed [illegible] [illegible] [illegible]

deposed [illegible] [illegible] [illegible]

4186

FILED
MAR 2 1960
ALICE J. DUCK, Clerk

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[illegible] [illegible] [illegible]

as

[illegible] [illegible] [illegible]

[illegible] [illegible] [illegible]

LOIS STARK CHANDLER,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
EUGENE HARRISON WOOD, IV,) AT LAW NO. 4186
Defendant.)

DEMURRER TO AMENDED COMPLAINT

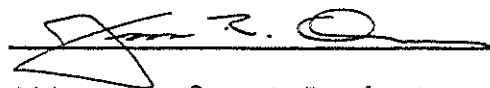
Now comes the defendant and demurs to the amended complaint heretofore filed in this cause and as grounds of such demurrer assigns, separately and severally, the following:

1. It does not state a cause of action.
2. No facts are alleged on which the relief sought can be granted.
3. The allegations of the amended complaint are conclusions of the pleader.
4. The allegations of the amended complaint are vague, indefinite and uncertain.
5. The allegations of the amended complaint are vague, indefinite and uncertain in that it does not allege with sufficient certainty where the alleged accident occurred.
6. The allegations of the amended complaint are vague, indefinite and uncertain in that it does not allege the plaintiff's injuries with sufficient certainty.

FILED

MAY 18 1960

ALICE L. DUCK, CLERK
REGISTER


Attorney for defendant

DEMURRER TO AMENDED COMPLAINT

LOIS STARK CHANDLER,

Plaintiff,

vs.

EUGENE HARRISON WOODS, IV,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4186

FILED

MAY 18 1969

ALICE L. DICK, CLERK
REGISTER

LOIS STARK CHANDLER

Plaintiff

VS.

EUGENE HARRISON WOODS, IV

Defendant

X IN THE CIRCUIT COURT OF

X BALDWIN COUNTY, ALABAMA

X

X AT LAW

X CASE NO. 4186

Comes now the Plaintiff and amends the last name of
the Defendant to read as follows:

Eugene Harrison Wood, IV

The Plaintiff alleges that Eugene Harrison Woods, IV
as originally named in the complaint and Eugene Harrison
Wood, IV, is one and all in the same person and the original
name was intended to name the amended name.

Filed
3-21-60

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

HARRY SEALE

LAWYER

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

HARRY SEALE

M. A. MARSAL

A. J. SEALE

LEON G. DUKE

February 16, 1960

MAILING ADDRESS:

POST OFFICE BOX 1318

HEMLOCK 2-6686

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

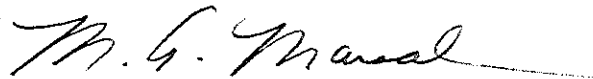
RE: CHANDLER VS. WOODS

Dear Mrs. Duck:

Please find enclosed herein the original and two copies of a complaint that I respectfully ask to be filed in your honorable court and have service perfected on the Defendant and the Defendant resides at 417 Battery Avenue, Selma, Alabama. Your kindness will be greatly appreciated.

Highest personal regards.

Yours truly,



M. A. MARSAL

MAM/sd

Encls.