

IN THE CIRCUIT COURT - LAW SIDE

You are hereby commanded to summon Harry Linden, individually and doing business as Linden Construction Company, and Donald Cooper to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of H. E. C. Barnett.

Alice J. Muck
Clerk.

X



x

Publication

269

hip, his left leg was seriously damaged, he suffered a massive thrombosis of his entire left leg, he was caused to incur large medical and hospital bills, he was caused to lose much time from his employment, he suffered severe physical and mental pain and anguish and he is permanently injured, all to the damage of the Plaintiff in the sum aforesaid, hence this suit.

Hugh M. Cuffey Jr.

James Stone
Attorneys for Plaintiff

Plaintiff demands a trial of this
cause by a jury.

Hugh M. Cuffey Jr.

James Stone
Attorneys for Plaintiff

FILED

JUN 7 1966

ALICE J. DUCK, CLERK
REGISTERED

4270
SUMMONS AND ~~BILL OF~~ COMPLAINT

* * * * *

H. E. C. BARNETT,

Plaintiff,

VS.

HARRY LINDEN, individually and
doing business as LINDEN CON-
STRUCTION COMPANY and DONALD
COOPER,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

* * * * *

FILED

JUN 7, 1960

ALICE L. DUCK, CLERK
REGISTERED

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

Received 7 day of June 1960
and on 11 day of 12

I served a copy of the within B.C.
on Harry Linden 6-21
Donald Cooper 6-20

By service on _____

TAYLOR WILKINS, Sheriff

By W. O. Barnett, S.

Silver Hill

Sheriff claims 120 miles at
Ten Cents per mile Total \$ 12.00
TAYLOR WILKINS, Sheriff

BY Barner
DEPUTY SHERIFF

Vs

Defendants.

AT LAW

NO. 4278

271

4278

FILED
AUG 5 1960
ALICE J. DUCK, Clerk

H. E. C. BARNETT,

VS.

Plaintiff,

HARRY L. LINDEN and DONALD
C. LINDEN, individually and
doing business as partners
under the firm name and
style of LINDEN CONSTRUCTION
COMPANY, and DONALD E. COOPER,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4278

ANSWER TO AMENDED COMPLAINT

Now come the defendants, each separately and severally,
and for answer to the plaintiff's amended complaint, saith:

1. Not guilty.

FILED

OCT 5 1960

ALICE J. DUCK, CLERK
REGISTER

J. T. Blackburn
LYONS, PIPES AND COOK

By Walter M. Cook

Attorneys for Defendants

ANSWER TO AMENDED COMPLAINT

H. E. C. BARNETT,

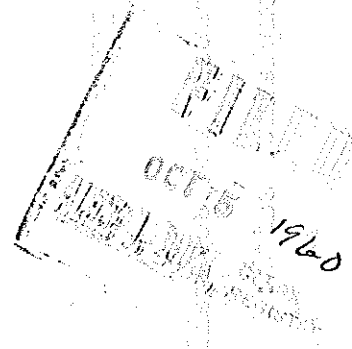
Plaintiff,

VS.

HARRY L. LINDEN and DONALD C.
LINDEN, individually and doing
business as partners under the
firm name and style of LINDEN
CONSTRUCTION COMPANY, and
DONALD E. COOPER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4278



H. E. C. BARNETT,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
HARRY LINDEN, individually	X	
and doing business as LINDEN	X	
CONSTRUCTION COMPANY and	X	AT LAW NO. 4278
DONALD COOPER,	X	
Defendants.	X	

Comes the Plaintiff in the above styled cause and amends his Complaint filed in said cause so that the same shall read as follows:

H. E. C. BARNETT,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
HARRY L. LINDEN and DONALD	X	
C. LINDEN, individually and	X	
doing business as partners	X	
under the firm name and style	X	AT LAW NO. 4278
of LINDEN CONSTRUCTION COMPANY	X	
and DONALD E. COOPER,	X	
Defendants.	X	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Thirty-five Thousand Dollars (\$35,000.00) as damages for that on, to-wit: November 20, 1959, the Defendant Donald E. Cooper who was then and there the agent, servant or employee of the Defendants Harry L. Linden and Donald C. Linden, individually and doing business as partners under the firm name and style of Linden Construction Company and while acting within the line and scope of his employment as such agent, servant or employee so negligently operated a motor vehicle which he was then and there driving on Armstrong Avenue, a public street in Baldwin County, Alabama, within the City Limits of Bay Minette, Alabama, at the point where Armstrong Avenue intersects U. S. Highway 31 as to cause or allow such motor vehicle to run into or against an automobile

in which the Plaintiff was riding at said time and place and which was then and there being driven along U. S. Highway 31, where the Plaintiff had a right to be, and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: he suffered a contusion of his left hip, his left leg was seriously damaged, he suffered a massive thrombosis of his entire left leg, he was caused to incur large medical and hospital bills, he was caused to lose much time from his employment, he suffered severe physical and mental pain and anguish and he is permanently injured, all to the damages of the Plaintiff in the sum aforesaid, hence this suit.

Hugh M. Daffey Jr
Chasoma Stone
Attorneys for Plaintiff

Plaintiff demands a trial of this cause by a jury.

Hugh M. Daffey Jr
Chasoma Stone
Attorneys for Plaintiff

9-6-1960
Served accepted for all
defendants
J. B. Blackburn
Atty. for Defs.

FILED
SEP 6 1960

ALICE J. DUCK, Clerk

AMENDED COMPLAINT

H. E. C. BARNETT,

Plaintiff,

VS.

HARRY L. LINDEN, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4278

FILED
SEP 6 1960
ALICE J. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA