

NELLIE N. DAVIS,

Plaintiff,

vs.

ROBERT W. NOREN,

Defendant.

IN THE CIRCUIT COURT OF

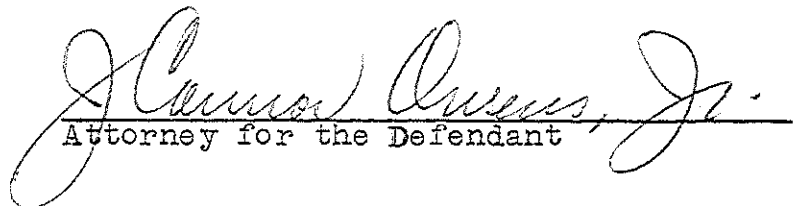
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 4298.

Now comes the Defendant, by his attorney, and for answer
to the Bill of Complaint filed in this cause, says as follows:

1. Not guilty.


Attorney for the Defendant

FILED
OCT 27 1960
ALICE J. DUCK, Clerk

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW NO. 4298.

NELLIE N. DAVIS,
Plaintiff,

vs.

ROBERT W. NOBEN,
Defendant.

ANSWER

FILED
OCT 27 1960
ALICE J. DUCK, Clerk

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
Dahlberg Building
BAY MINETTE, ALABAMA

NELLIE N. DAVIS,
Plaintiff,
VS.
ROBERT W. NOFEN,
Defendant.

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

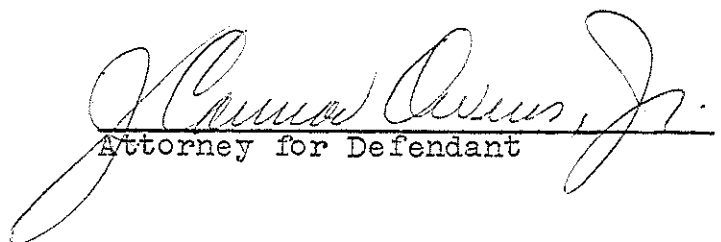
DEMURRER:

Now comes the Defendant, by his attorney, and demurs to the Complaint filed in this cause and as grounds therefor assigns the following separately and severally:

1. That said Complaint does not state a cause of action.
2. That said Complaint does not allege that the accident took place on a public road in Baldwin County, Alabama.

FILED
AUG 1 1960

ALICE J. DUCK, Clerk


Attorney for Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW NO. 4228

NELLIE N. DAVIS,

Plaintiff,

VS.

ROBERT W. NOFEN,

Defendant.

DEMURRERS

FILED
AUG 1 1960
ALICE J. DUCK, Clerk

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

July 7, 1960

NELLIE N. DAVIS, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

ROBERT W. NOFEN, Defendant

CASE NO. 4298

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Bettye Frink, Secretary of State, hereby certify that on
I sent by registered mail in an envelope addressed as follows:

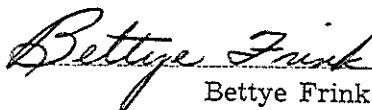
June 27, 1960

"Robert W. Nofen
318 Washington Avenue
Highwood, Illinois""Registered Mail—
Return Receipt Requested
Deliver to Addressee Only"bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of
the State of Alabama in words and figures as follows:"Robert W. Nofen
318 Washington Avenue
Highwood, IllinoisYou will take notice that on June 24, 1960 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: NELLIE N. DAVIS, Plaintiff VS ROBERT W. NOFEN, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

Case No. 4298 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and
effect of personal service upon you.WITNESS MY HAND and the Great Seal of the State of Alabama this the 27
day of June 1960

Enclosure (1)

(Signed) Bettye Frink
Secretary of State"I further certify that the notice above set out which was so mailed in the envelope addressed
as above set forth had attached to it a true copy of the summons and complaint in the above-styled
cause.I further certify that on July 6, 1960 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Highland Park, Ill.
on July 2, 1960WITNESS MY HAND and the Great Seal of the State of Alabama this the 7 day
of July 1960Bettye Frink
Secretary of StateEnclosures: Return Receipt Card and copy
of Summons and Complaint.cc: Honorable John Chason
Chason & Stone
Attorneys at Law
Arcade Bldg.
Bay Minette, Alabama

Taylor, Edwards & Yancey,
Attorneys for Plaintiff

Lyster, Edwards & Yancey
Benson & Stone
Attorneys for Plaintiff

Robert W. Nofen
318 Washington Avenue
Highwood, Illinois

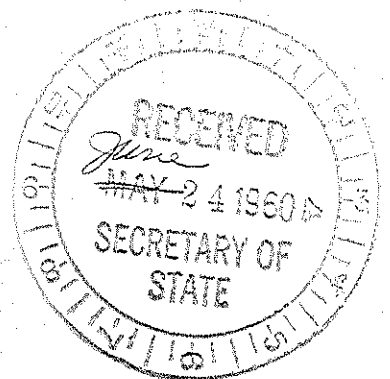
* * * * *

SUMMONS AND COMPLAINT

* * * * *

TVA SIDE
BAYVIEW CONNEX, VIVABAW
IN THE CIRCUIT COURT OF
DEFENDANT
ROBERT A. MOORE,
vs.
Pittman,
STANLEY DAVIS,

* * * * *



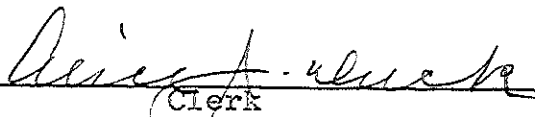
STATE OF ALABAMA)
)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE

TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert W. Nofen 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 Nellie N. Davis.

Witness my hand this 22 day of June, 1960.


Clerk

NELLIE N. DAVIS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
ROBERT W. NOFEN,	X	
Defendant.	X	AT LAW
	X	

COUNT ONE:

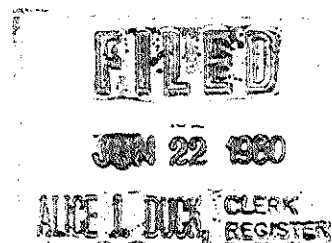
The Plaintiff claims of the Defendant the sum of Seventy-five Thousand Dollars (\$75,000.00) as damages for that, on, to-wit: July 10, 1959, the Plaintiff was a passenger in an automobile which was being driven on U. S. Highway 31 at a point about fifteen Hundred feet East of Spanish Fort Restaurant in Baldwin County, Alabama, and at said time and place the Defendant negligently drove an automobile into, upon or against the automobile in which the Plaintiff was riding and as a proximate consequence of the negligence of the Defendant the Plaintiff was injured in this: she received a fracture of the 4th lumbar vertebrae; she received a contusion of the left lateral chest wall and sprain of the left shoulder; she was internally injured; she was caused to suffer much pain and mental anguish; she was confined in a hospital for approximately six (6) weeks; she was caused to lose twenty-one (21) weeks from her work where she was then employed; she was caused to incur large medical and hospital

expenses and she was permanently injured, all to the damages of the Plaintiff in the sum above mentioned, hence this suit.

Taylor, Edwards & Yancy
Deason & Stone
Attorneys for Plaintiff

Plaintiff demands a trial of this
cause by jury.

Taylor, Edwards & Yancy
Deason & Stone
Attorneys for Plaintiff



Defendant's Address:

Robert W. Nofen
318 Washington Avenue
Highwood, Illinois

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RECEIVED IN OFFICE
JUN 24 1960
M. S. BUTLER, Sheriff

Executed by serving 3 copies of
the within on Betty Fink
Secretary of State of The State of
Alabama.

This the 24 day of June 1960

Sheriff of Montgomery County
M. S. Butler,
By Renee D. S.

The Sheriff claims 2
miles at 10c per mile for a total
of \$ 20
M. S. Butler, Sheriff
Montgomery County, Ala.

NELLIE N. DAVIS,
Plaintiff,
vs.
ROBERT W. NOFEN,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT
(*****

FILED
JUN 22 1960
ALICE L. DUCK, CLERK

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA