

MARGARET V. DAVIS,  
Plaintiff,  
vs.  
ROBERT W. NOFEN,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

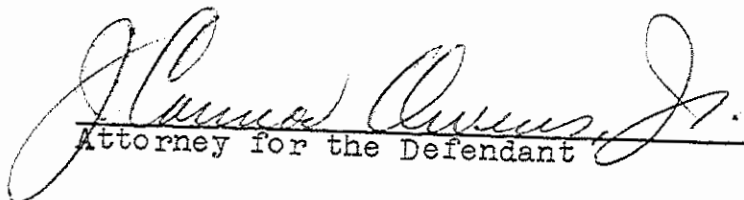
AT LAW

NO.

4299

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. 27-94  
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MARGARET V. DAVIS,

Plaintiff,

vs.

ROBERT W. NOFEN,

Defendant.

\*\*\*\*\*

ANSWER

\*\*\*\*\*

FILED

OCT 27 1960

ALICE J. DUCK, Clerk

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J. CONNOR OWENS, JR.

ATTORNEY AT LAW

Dahlberg Building

BAY MINETTE, ALABAMA

July 7, 1960

MARGARET V. DAVIS, Plaintiff

VS

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA LAW SIDE

ROBERT W. NOFEN, Defendant

CASE NO. 4299

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE

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, Illinois"

You 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: MARGARET V. DAVIS, Plaintiff VS ROBERT W. NOFEN, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE

Case No. 4299 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 5, 1960 I received the return card, showing  
receipt by the designated addressee of the aforementioned matter at Highland Park, Ill.  
on July 2, 1960

WITNESS MY HAND and the Great Seal of the State of Alabama this the 7 day  
of July 1960



Bettye Frink  
Secretary of State

Enclosures: Return Receipt Card and copy  
of Summons and Complaint.

cc: Honorable John Chason  
Chason & Stone  
Attorneys at Law  
Arcade Bldg.  
Bay Minette, Alabama

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 Margaret V. Davis,

Witness my hand this 22 day of June, 1960.

Alfred J. Newkirk  
Clerk

MARGARET V. DAVIS,

Plaintiff,

vs.

ROBERT W. NOFEN,

Defendant.

I  
I  
I  
I  
I  
I  
I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Twenty-five Thousand Dollars (\$25,000.00) as damages for that on, to-wit: July 10, 1959 the Defendant Robert W. Nofen so negligently operated a motor vehicle on U. S. Highway # 31 at a point about 1500 feet East of Spanish Fort Restaurant in Baldwin County, Alabama as to cause or allow such automobile to run into or against an automobile in which the Plaintiff was riding at said time and place and as a proximate result of the negligence of such Defendant the Plaintiff was injured in this: she received severe injury to her back and spine; her neck was injured; she was caused to practically lose the use of her arms; she suffered severe pain and mental anguish; she has been confined in a hospital; she was caused to incur large medical and hospital expense; she was made sick and sore and she is permanently injured all to the damage of the Plaintiff in the sum above mentioned, hence

this suit.

*Deanna Stone*  
Attorney for Plaintiff

Plaintiff demands a trial of this  
cause by a jury.

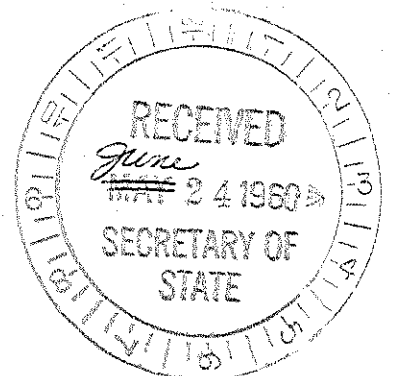
*Deanna Stone*  
Attorney for Plaintiff

Defendant's address:  
Robert W. Nofen  
348 Washington Avenue  
Highwood, Illinois

IN THE CIRCUIT COURT OF  
DAVIDSON COUNTY, TENNESSEE

IVAN SIDE

FILED  
JUN 24 1960  
CLERK



4299

SUMMONS AND COMPLAINT

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MARGARET V. DAVIS,  
Plaintiff,

VS.

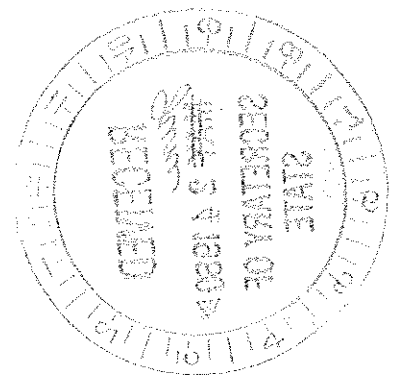
ROBERT W. NOFEN,  
Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
LAW SIDE.

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FILED  
JUN 22 1960  
CLERK  
REGISTER



MARGARET V. 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 Highway 31 is a public road in Baldwin County, Alabama.
3. That said Complaint does not allege the nature of the injuries to the back and spine of the Plaintiff.
4. That said Complaint does not allege the nature of the injury to the neck of the Plaintiff.
5. That said Complaint does not allege the nature of the injury to the arms of the Plaintiff.
6. The allegation that "she was caused to practically lose the use of her arms" is a conclusion of the pleader.
7. No length of confinement in a hospital is alleged.
8. No allegations are made to support a claim for permanent injuries.

FILED

AUG 1 1952

ALICE J. DUCK, Clerk

*J. Cannon Owens, Jr.*  
Attorney for Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 4227

MARGARET V. DAVIS,  
Plaintiff,  
VS.  
ROBERT W. NOFEN,  
Defendant.

DEMURRER

FILED  
AUG 1 1960

ALICE J. DUCK, Clerk

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



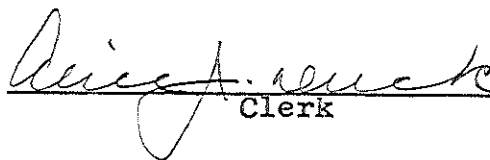
STATE OF ALABAMA     )  
                              )  
BALDWIN COUNTY        )

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 Margaret V. Davis,

Witness my hand this 22 day of June, 1960.

  
Clerk

MARGARET V. DAVIS,

Plaintiff,

vs.

ROBERT W. NOFEN,

Defendant.

X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

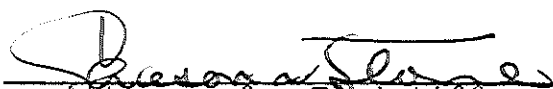
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Attorney for Plaintiff

Plaintiff demands a trial of this  
cause by a jury.

  
Attorney for Plaintiff

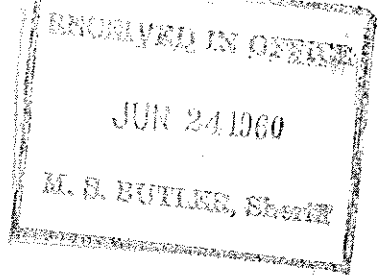
FILED

JUN 22 1937

ALICE L. DUCK, CLERK  
REGISTER

Defendant's address:  
Robert W. Nofen  
318 Washington Avenue  
Highwood, Illinois

4299



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Executed by serving 3 copies of  
the within on Petty Frank  
Secretary of State of The State of  
Alabama.

This the 24 day of June 1960

Sheriff of Montgomery County  
M. S. Butler,

By Rameo D. S.

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

SUMMONS AND COMPLAINT

\*\*\*\*\*

MARGARET V. DAVIS,  
Plaintiff,

vs.

ROBERT W. NOFEN,  
Defendant.

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

\*\*\*\*\*

LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA