

4644

EARL BLACKWELL,

Plaintiff,

vs.

P. J. STEIGERWALD, doing  
business as FOLEY LAUNDRY  
AND DRY CLEANER, and ROBERT  
P. STEIGERWALD,

Defendants.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Come the Defendants in the above styled cause and for plea to  
the Complaint filed in said cause, separately and severally, say:

1. That they are not guilty of the matters alleged in said  
complaint.

2. For further plea to the complaint the Defendants say that  
at the time and place complained of in the complaint the Plaintiff,  
acting by and through his agent, servant or employee, who was then  
and there acting within the line and scope of his authority as such,  
was himself guilty of negligence which was the proximate cause of  
his injuries and damages complained of hence he cannot recover in  
this suit.

FILED

MAR 30 1961

WILLIE L. DUCK, CLERK  
REGISTER

*James Stone*  
Attorneys for Defendants

4644

EARL BLACKWELL,

Plaintiff,

VS.

P. J. STEIGERWALD, ET AL.

Defendants

\* \* \* \* \*

IN THE CIRCUIT COURT OF

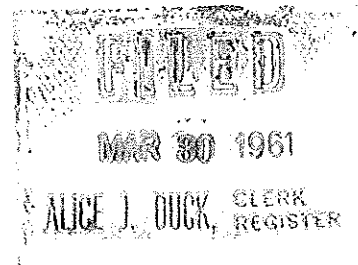
BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

PLEA

\* \* \* \* \*



CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon P. J. STEIGERWALD, doing business as FOLEY LAUNDRY and DRY CLEANER, and ROBERT P. STEIGERWALD, 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 EARL BLACKWELL.

Witness my hand this 17 day of March, 1961.

Glenn J. Duck  
CLERK

\*\*\*\*\*

EARL BLACKWELL.

Plaintiff.

-VS-

P. J. STEIGERWALD, doing  
business as FOLEY LAUNDRY  
and DRY CLEANER, and ROBERT  
P. STEIGERWALD

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAM

COUNT ONE

The plaintiff claims of the defendants the sum of \$217.68 as damages, for that on to-wit the 17th day of June, 1960 at a point on Alabama Highway 59, a public highway in Baldwin County, Alabama, near the Spinning Wheel Drive-In in Foley, Alabama, the defendant, P. J. Steigerwald acting by and through his agent, servant or employee, the defendant Robert P. Steigerwald, who was then and there acting within the line and scope of his employment as such agent, servant or employee, negligently drove a motor vehicle into or against the motor vehicle owned by the plaintiff and as a proximate result of the negligence of such defendants, the motor vehicle owned by the plaintiff was damaged

in this: Its rear quarter assembly, its rear trunk lid, its rear door, its rear bumper and its rear quarter side mould was bent or torn and was damaged all to the damage of the plaintiff in the sum above mentioned, hence this suit.

FILED

MAR 17 1961

ALICE J. DUCK, CLERK  
REGISTER

*E. Plasan*  
Attorney for Plaintiff

✓  
No. 4644

SUMMONS AND COMPLAINT

EARL BLACKWELL

Plaintiff

Vs.

P. J. STEIGERWALD, doing  
business as FOLEY LAUNDRY  
AND DRY CLEANER, and ROBERT  
P. STEIGERWALD.

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

FILED

MAR 17 1961

ALICE J. DUCK, CLERK  
REGISTER

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

Received 17 day of March 1961  
and on 31 day of May 1961  
I served a copy of the within  
on P. J. Steigerwald  
and Robert P. Steigerwald  
By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
BY [Signature] D. S.

Sheriff claims 12.44 miles at

Ten Cents per mile Total \$ 1.2044  
TAYLOR WILKINS, Sheriff

BY Childress  
DEPUTY SHERIFF

**CECIL G. CHASON**

**ATTORNEY-AT-LAW  
FOLEY, ALABAMA**

March 15, 1961

Mrs. Alice J. Duck  
Register  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing herewith Summons and Complaint in the case of  
BLACKWELL VS. STEIGERWALD.

Yours very truly,

  
Cecil G. Chason

CGC.bs

CC: John Chason  
Attorney-At-Law  
Bay Minette, Alabama