

SHEDRICK A. HARDY,

Plaintiff,

vs.

MYLIE WASHINGTON,

Defendant.

Y

Y

Y

Y

Y

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

No. 4713

Comes the Defendant in the above styled cause and demurs to Count One of the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That the place where the accident occurred is not sufficiently set out.
3. For aught that appears there may be more than one road leading from Highway 31 to Hurricane.
4. That said complaint fails to state the length of time that he lost the use of his automobile.
5. For aught that appears from said complaint, the Plaintiff did not need to use his automobile during the period of time that it was being repaired.
6. That the allegation that the Plaintiff was put to much inconvenience in having his automobile repaired does not state any ground for recovery.

CHASON & STONE

FILED

JUL 10 1951

ALICE A. DUCK, Clerk

By:

  
Attorneys for Defendant

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mylie Washington 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 the same, then and there to answer the complaint of Shedrick A. Hardy.

WITNESS my hand this 26 day of May, 1961.

Alvin J. Luck  
Clerk

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SHEDRICK A. HARDY,

Plaintiff,

VS.

MYLIE WASHINGTON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

4712

C O M P L A I N T

COUNT ONE

Plaintiff claims of the Defendant the sum of Five Hundred and no/100 Dollars (\$500.00) for that heretofore on to-wit, December 3, 1960, while the Plaintiff was driving his automobile on Hurricane Road at a point approximately one-half mile West of U. S. Highway 31, which said Hurricane Road is a public road in Baldwin County, Alabama, and where the Plaintiff had a right to be, the Defendant so negligently operated a motor vehicle as to cause the same to run into, upon or against the automobile of Plaintiff and as a proximate result of the negligence of the said Defendant the automobile of Plaintiff was bent, damaged and broken; the front bumper was bent; the grill panel was broken; the radiator was broken and damaged so as to make it useless; the right front fender was bent and broken; he was caused to lose the use of his

said automobile while it was being repaired and he was put to much inconvenience in and about having his said automobile repaired all to his damage as aforesaid, hence this suit.

  
Attorney for Plaintiff

FILED  
MAY 26 1961  
ALICE J. DUCK, Clerk

*Defendant's address  
Douglassville*

COMPLAINT *4713*

SHDRICK A. HARDY,  
Plaintiff,  
  
VS.  
  
MYLIE WASHINGTON,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
AT LAW

FILED  
MAY 26 1961  
ALICE J. DUCK, Clerk

JAMES R. OWEN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

Received 26 day of May 1961  
and on 30 day of May 1961  
I served a copy of the within on Mylie Washington  
on \_\_\_\_\_  
By service on \_\_\_\_\_  
  
TAYLOR WILKINS, Sheriff  
BY W. A. Wilkins D. S.  
*one*