

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LORENE M. JOHNSON and H. M. JOHNSON, 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 BESSIE SODOMA.

WITNESS my hand this the 1st day of June, 1961.

Alice J. Luck  
Clerk

BESSIE SODOMA,  
Plaintiff,

vs

LORENE M. JOHNSON and  
H. M. JOHNSON,  
Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

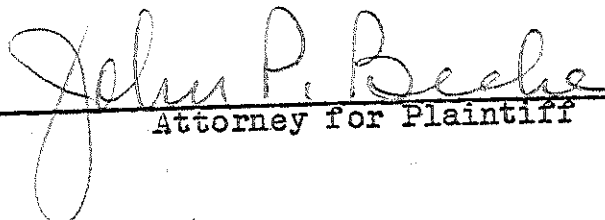
The Plaintiff claims of the Defendants the sum of SEVEN HUNDRED (\$700.00) DOLLARS, for that heretofore on, to-wit: the 2nd day of April, 1961, Plaintiff's automobile being driven by one Robert Couch was proceeding east upon and along U. S. Highway No. 90 in Baldwin County, Alabama, at a point approximately 7.8 miles east of the town of Robertsdale, which point is at the intersection of Riemer Road, and that while the automobile of the Plaintiff was lawfully traveling upon said Highway 90 in an easterly direction, the Defendant, Lorene M. Johnson, who was driving an automobile on the said highway in an easterly direction and in the same direction Plaintiff was traveling, so negligently operated the said automobile as to cause it to run upon or against the said automobile of the Plaintiff, and as a proximate consequence of the negligence of the Defendant, Lorene M. Johnson, Plaintiff's automobile was bent, damaged and broken; the right rear fender of Plaintiff's automobile was bent, damaged and broken; the right rear wheel of Plaintiff's automobile was damaged;

the rear light on the Plaintiff's automobile bent, damaged and broken;  
the body of the Plaintiff's automobile was bent, damaged and broken;  
the frame of Plaintiff's automobile was bent, damaged and knocked out  
of line; all to the Plaintiff's damage, as aforesaid.

COUNT TWO

The Plaintiff claims of the Defendants the sum of SEVEN HUNDRED (\$700.00) DOLLARS, for that heretofore on, to-wit: the 2nd day of April, 1961, Plaintiff's automobile, being driven by one Robert Couch, was proceeding east upon and along U. S. Highway No. 90 in Baldwin County, Alabama, at a point approximately 7.8 miles east of the town of Robertsdale, which point is at the intersection of Riemer Road, and that while the automobile of the Plaintiff was lawfully traveling upon said highway 90 in an easterly direction, the Defendant, Lorene M. Johnson, who was driving an automobile on the said highway in an easterly direction and in the same direction Plaintiff's automobile was traveling, and at said time and place the said Defendant, Lorene M. Johnson, as agent, servant or employee of the Defendant, H. M. Johnson, wilfully or wantonly caused it to run upon or against the said automobile of the Plaintiff, and as a proximate consequence of the said wilful or wanton negligence of the said Defendant, Lorene M. Johnson, Plaintiff's automobile was bent, damaged and broken; the right rear fender of Plaintiff's automobile was bent, damaged and broken; the right rear wheel of Plaintiff's automobile was damaged; the rear light on Plaintiff's automobile was bent, damaged and broken; the body of Plaintiff's automobile was bent, damaged and broken; the frame of Plaintiff's automobile was bent damaged and knocked out of line; all to the Plaintiff's damages, as aforesaid.

FILED  
JUN - 1 - 1961  
ALICE J. DUCK, Clerk

  
Attorney for Plaintiff

EXECUTED  
This 12 day of June, 1961  
by serving a copy of the within on  
Loren M. Johnson  
RAY D. BRIDGES, Sheriff  
By W. H. Fischer D. S.

EXECUTED  
This 14 day of June, 1961  
by serving a copy of the within on  
H. M. Johnson  
RAY D. BRIDGES, Sheriff  
By W. H. Fischer D. S.

RECEIVED  
JUN 5 1961  
SHERIFF'S OFFICE

2721  
4721  
BESSIE SODOMA,  
Plaintiff,

vs

12/25  
LORENE M. JOHNSON, and  
14/ H. M. JOHNSON,  
Defendants.

2002 Eagle Lk  
Mobile, Ala.

-----  
Summon and Complaint  
-----

FILED  
JUN 1 1961  
ALICE J. DUCK, Clerk

JOHN P. BEEBE  
ATTORNEY AT LAW  
ROBERTSDALE, ALABAMA

BESSIE SODOMA,

Plaintiff,

vs.

LORENE M. JOHNSON and  
H. M. JOHNSON,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Come the Defendants in the above styled cause and demur to the complaint filed in said cause and each and every count thereof, separately and severally, and assign the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That "COUNT ONE" of the complaint does not state a cause of action against the Defendant H. M. Johnson.
3. That there is no allegation in "COUNT ONE" of the complaint charging negligence on the part of the Defendant H. M. Johnson.
4. For aught that appears from "COUNT ONE" of the Complaint the Defendant H. M. Johnson had no connection in any way with such accident.
5. That "COUNT TWO" of the complaint fails to allege that the Defendants, or either of them, willfully or wantonly injured the Plaintiff.
6. That "COUNT TWO" of the Complaint fails to allege that the Defendant, or either of them, willfully or wantonly damaged the Plaintiff.
7. That "COUNT TWO" of the complaint does not allege that the Defendant Lorene M. Johnson was, at the time of the accident complained of, the agent, servant or employee of the Defendant H. M. Johnson and acting within the line and scope of her employment as such agent, servant or employee.
8. That both "COUNT ONE" and "COUNT TWO" are vague and indefinite.
9. That said counts fail to allege any duty owing from the Defendants to the Plaintiff.

235  
*Chason & Stone*  
Attorneys for Defendants

FILED

AUG 22 1961

ALICE L. DUCK, CLERK  
REGISTER

472-1

BESSIE SODOMA,

Plaintiff,

VS.

LORENE M. JOHNSON ET AL.

Defendants

\*\*\*\*\*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\*\*\*\*\*

DEMURRER

\*\*\*\*\*

FILED

AUG 22 1961

ALICE L. DUCK,  
CLERK  
REGISTER

JOHN P. BEEBE  
ATTORNEY AT LAW  
ROBERTSDALE, ALABAMA

May 31st, 1961

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

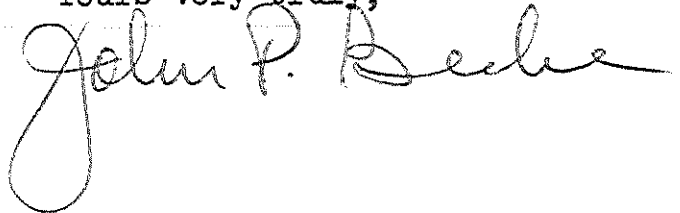
Dear Mrs. Duck:

I enclose original and two copies of summon and complaint to be filed in the Circuit Court, in the matter of Sodoma vs. Johnson, suit at law.

Please sign the summon and place in the hands of the Sheriff for service on the Defendants.

I am informed that they are husband and wife and live at 2002 Eagle Drive, Mobile, Alabama.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".