

WILMA BRUNER FIKE,

Plaintiff,

vs.

FREDERICK DREDGING COMPANY,  
INC., a corporation, and ROY  
DUKES,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4740

Comes the Defendant Roy Dukes and for plea to the complaint filed in said cause, separately and severally, says:

1. Not guilty.

2. At the time and place complained of in the complaint the Plaintiff herself was guilty of negligence in the operation of the automobile which she was then and there driving which was the proximate cause of her injuries and damages in that she negligently drove such automobile into or against the motor vehicle which the Defendant Roy Dukes was driving along said highway at said time and place.

3. The Defendant Roy Dukes alleges that the Plaintiff herself was guilty of negligence at the time and place complained of in the complaint, which negligence was the proximate cause of the Plaintiff's injuries and damages in that she operated the automobile which she was driving along such highway so close to the rear end of the vehicle which the Defendant Roy Dukes was driving that when he gave a signal to turn to the right and when he slowed down in making his turn the Plaintiff negligently drove the automobile in which she was riding into or against the rear of the motor vehicle which the Defendant Roy Dukes was driving and the Defendant Roy Dukes alleges that the negligence of the Plaintiff was the proximate cause of her injuries and damages, hence she should not recover.

  
Attorneys for Roy Dukes

WILMA BRUNER FIKE,

Plaintiff,

vs.

FREDERICK DREDGING COMPANY,  
INC., a corporation, Et. Al.

Defendants.

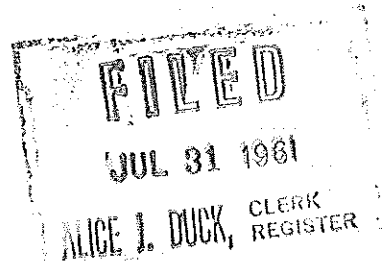
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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 4740

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PLEAS

( (\*\*\*\*\*



CHASON & STONE

ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Frederick Dredging Company, Inc., a Corporation, and Roy Dukes 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 Wilma Bruner Fike.

WITNESS my hand this 26 day of June, 1961.

Alice J. Duck  
Clerk

Defendant, Frederick Dredging Company,  
can be served at Bon Secour, Alabama. *N.F.*

Defendant, Roy Dukes, can be served  
at Foley, Alabama

*E.A. - 7-8-61*  
\*\*\*\*\*

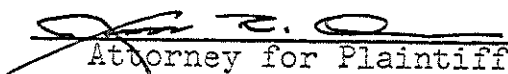
WILMA BRUNER FIKE,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
FREDERICK DREDGING COMPANY, INC.,	)	AT LAW
a Corporation, and ROY DUKES,	)	
	)	
Defendants.	)	

# C O M P L A I N T

## COUNT ONE

Plaintiff claims of the Defendants the sum of ONE THOUSAND DOLLARS (\$1,000.00) for that heretofore on to-wit, July 22, 1960, Plaintiff was driving an automobile in a Southerly direction along Alabama Highway 59, which is a public road in Baldwin County, Alabama, at a point approximately 100 feet South of the intersection of Alabama Highway 59 and Michigan Road and while Plaintiff was so operating the vehicle at said time and place, the Defendant, Roy Dukes, who was then and there an agent, servant or employee of

the Defendant, Frederick Dredging Company, Inc., a Corporation, acting within the line and scope of his authority, as such agent, servant or employee, so negligently operated a motor vehicle as to cause the automobile which Plaintiff was driving to run into, upon or against the vehicle which the said Defendant, Roy Dukes, was operating and as a proximate result of the negligence of the said Defendant, Roy Dukes, who was then and there an agent, servant or employee of the Defendant, Frederick Dredging Company, Inc., a Corporation, acting within the line and scope of his authority as such agent, servant or employee, the Plaintiff was made sick, sore and nervous; she suffered severe headaches and continues to be nervous and have headaches all to her damages aforesaid, hence this suit.

  
Attorney for Plaintiff

Plaintiff demands a trial of said cause by Jury.

  
Attorney for Plaintiff

FILED

JUN 26 1961

ALICE J. DUCK, Clerk

WILMA BRUNER FIKE,

Plaintiff,

VS.

FREDERICK DREDGING COMPANY, INC.  
a Corporation, and ROY DUKES,

Defendants.

Returned 12 day of July 1961  
Not found in my county after diligent search and in-  
quiry Frederick Dredging Co.  
Taylor Wilkins, Sheriff  
Chadwick  
Deputy Sheriff

Received 27 day of June 1961  
and on 8 day of July 1961  
I served a copy of the within By  
on Frederick Dredging Co.  
Roy Dukes 7-861  
By service on Taylor Wilkins, Sheriff  
By  
Dredging

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED  
JUN 26 1961  
ALICE J. DUCK, Clerk

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
Taylor Wilkins, Sheriff  
by CC  
County Clerk

JAMES R. OWEN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

STATE OF ALABAMA )  
BALDWIN COUNTY )

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Alice J. Duke  
Clerk

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Defendant, Roy Dukes, can be served  
at Foley, Alabama

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Plaintiff,

VS.

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Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

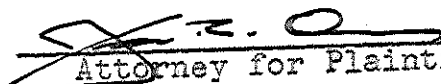
4740

C O M P L A I N T

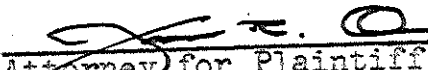
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Attorney for Plaintiff

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Attorney for Plaintiff

FILED  
APR 1 1934  
U.S. DIST. CT.  
S.D. CALIF.

Frederick met found  
He is in  
Lake Charles La

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