

JOHN WERNER,

Plaintiff,

VS.

VELMA DONALDSON,

Defendant.

IN THE CIRCUIT COURT

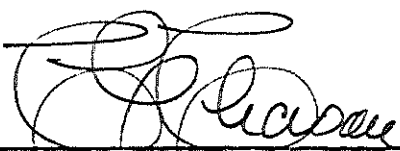
OF BALDWIN COUNTY, ALABAMA,

AT LAW

A N S W E R

Comes the Defendant in the above styled cause and as Answer to the Bill of Complaint filed therein shows as follows:

1. That she is not guilty of the matters alleged therein.
2. That the Plaintiff is not without fault.
3. For further plea Defendant shows that Plaintiff was guilty of negligence which contributed to the injury of Complainant, in that on the said day and date alleged, the Plaintiff attempted to stop or break up a fight between dogs and by doing so he knew, or should have known that injury to him might result.


Attorney for Defendant

FILED

APR 25 1962

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Velma Donaldson 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 John Werner.

WITNESS my hand this 16th day of April, 1962

Alice J. Duck
Clerk

Ex-4-1862-----

JOHN WERNER,

Plaintiff,

Vs.

VELMA DONALDSON,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.

5-113

The Plaintiff claims of the Defendant the sum of ONE THOUSAND DOLLARS (\$1,000.00) as damages for that heretofore on, to-wit, 2nd day of April, 1962, the Defendant was the owner of or in control of a vicious dog, and the Defendant knew or had good reason to believe, that the said dog would bite people if permitted to run at large, and the Defendant negligently permitted said dog to run at large, and as a proximate result thereof on, to-wit, the 2nd day of April, 1962, while the said dog was running at large, it bit the Plaintiff making him sick and causing him great mental and physical pain, and causing him to incur doctor bills in an effort to cure his injuries, all to the loss of the Plaintiff in the aforesaid amount.

FILED

APR 16 1962

ALICE J. DUCK, CLERK
REGISTER

Defendant's Address:

Elberta, Alabama

WILTERS & BRANTLEY

BY:

William M Brantley
Attorney for the Plaintiff

710 5113

John Werner,
Plaintiff,

05

Velma Donaldson,
Defendant

Received 16 day of Apr 1967
and on 18 day of April 1967
I served a copy of the within St e
on Velma Donaldson

By service on _____

TAYLOR WILKINS Sheriff
By Carlita King

E. H. Carter

Sheriff claims 8.4 miles at

Ten Cents per mile Total \$ 8.40

TAYLOR WILKINS Sheriff

BY CC
DEPUTY SHERIFF

FILED

APR 16 1962

ALICE J. DUCK, CLERK
REGISTER

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

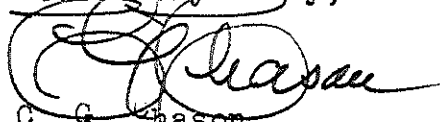
April 20, 1962

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Answer of the Defendant
in the case of Werner Vs. Donaldson, a copy is being
sent to the Attorney for the Plaintiff.

Yours very truly,


C. G. Chason

CGC.bs