

BERNARD WHITE and BERNARD
WHITE, as next friend, of
VICTORIA WHITE, a minor,

Plaintiff

vs.

JAMES McAFFEE and RANDOLPH
L. SELLARS,

Defendants

Y
Y
Y
Y
Y
Y
Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

5188

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

1. Not guilty.

CHASON & STONE

By:

John Chason
Attorneys for Defendants

FILED

JUN 28 1962

ALICE A. BUCK, CLERK
REGISTER

BERNARD WHITE and BERNARD
WHITE, as next friend, of
VICTORIA WHITE, a minor,

Plaintiff

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JAMES McAFFEE and RANDOLPH L.
SELLARS,

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IN THE CIRCUIT COURT OF
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AT LAW

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PLEA

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SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5188

TERM, 19...

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James McAffee & Randolph L. Sellars

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the
Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

James McAffee and Randolph L. Sellars, Defendant.

by Bernard White and Bernard White, as next frien, of VICTORIA WHITE, minor
Plaintiff.

Witness my hand this 28 day of June 19 62

Alice J. Duck, Clerk

BERNARD WHITE and
BERNARD WHITE, as
next friend, of VICTORIA
WHITE, minor

Plaintiff

vs

JAMES McAFFEE and
RANDOLPH L. SELLARS

Defendants

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NO. 5188

COUNT ONE:

The plaintiff claims of the defendants the sum of Twenty-five Hundred (\$2500.00) Dollars as damages, for that, heretofore, on to-wit, the 15th day of March, 1961, plaintiff's minor daughter was a passenger in an automobile pickup truck, on a public highway, U. S. Highway numbered 31 in Baldwin County, approximately 12 miles East of the City Limits of Bay Minette, Baldwin, Alabama, near the community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAfee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit, a truck tractor and trailer, then and there, as to cause said motor vehicle, to-wit, a truck tractor and trailer, he was operating to run over, upon or against the automobile pickup truck in which plaintiff's minor daughter was then and there a passenger; and plaintiff avers that as a proximate consequence thereof his said daughter was injured suffering bruises and contusions and suffering from fright that her nerves are damaged creating a nervous condition so that said minor daughter is unable to sleep at night crying out frequently in the nighttime and plaintiff avers that all of her said injuries were proximately caused by the said negligence of the said defendant, Randolph L. Sellars, agent, servant or employee of the defendant, James McAfee, while acting within the line and scope of his employment as such agent, servant or employee in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid.

And plaintiff avers that as the result and consequence of said injuries sustained by his said minor daughter he was put to the expense of doctors' bills, hospital expenses; for all of which he claims damages as aforesaid.

THOMPSON & WHITE

BY: *C. L. M. Thompson*
Attorneys for plaintiff

Plaintiff respectfully requests trial by jury.

THOMPSON & WHITE

BY: _____
Attorneys for plaintiff

FILED

JUN 28 1962

ALICE J. DUCK, CLERK
REGISTER