

4899

DENNIS RAY BREEDLOVE,                   X  
a Minor, suing by his father,           X  
C. T. Breedlove, as next friend,       X

Plaintiff,                   X

vs.                                       X

BOBBY LOTT,                               X

Defendant.                   X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

PLEA

Comes now the Defendant in the above styled cause,  
by his Attorneys, and for answer to the Complaint heretofore  
filed against him pleads as follows:

1. Not guilty.

CHASON & STONE

By: John Earle Chason

FILED

NOV 2 1961

ALICE L. DICK, CLERK  
REGISTER

4899

DENNIS RAY BREEDLOVE,  
a minor suing by his father  
C. T. Breedlove as next friend,

Plaintiff,

vs.

BOBBY LOTT,

Defendant.

\* \* \* \* \*

PLEA

\* \* \* \* \*

FILED

NOV 2 1931

ALICE J. DUCK, CLERK  
REGISTER

CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

October 31, 1961

DENNIS RAY BREEDLOVE, A MINOR  
 SUIING BY HIS FATHER, C. T.  
 BREEDLOVE, AS NEXT FRIEND, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN  
 COUNTY, ALABAMA

VS

BOBBY LOTT, Defendant

CASE NO. 4899

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

I, Bettye Frink, Secretary of State, hereby certify that on October 6, 1961  
 I sent by registered mail in an envelope addressed as follows:

" Bobby Lott  
 320 N. 19th Avenue  
 Hattiesburg, Mississippi"

"Registered Mail—  
 Return Receipt Requested  
 Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of  
 the State of Alabama in words and figures as follows:

" Bobby Lott  
 320 N. 19th Avenue  
 Hattiesburg, Mississippi

You will take notice that on October 6, 1961 the Sheriff of Montgomery  
 County, Alabama, served upon me, in my official capacity, summons and complaint in a  
 case entitled: DENNIS RAY BREEDLOVE, A MINOR SUIING BY HIS FATHER, C. T.  
 BREEDLOVE, AS NEXT FRIEND, Plaintiff VS BOBBY LOTT, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA  
 Case No. 4899 a true copy of which summons and complaint is attached hereto  
 and the said service upon me as Secretary of State of the State of Alabama has the force and  
 effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 6  
 day of October 1961

Enclosure (1)

(Signed) Bettye Frink  
 Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed  
 as above set forth had attached to it a true copy of the summons and complaint in the above-styled  
 cause.

I further certify that on Oct 13 1961 I received the return card, showing  
 receipt by the designated addressee of the aforementioned matter at Hattiesburg, Miss.  
 on Oct 11 1961

WITNESS MY HAND and the Great Seal of the State of Alabama this the 31 day  
 of October 1961

*Bettye Frink*  
 Bettye Frink  
 Secretary of State

Enclosures: Return Receipt Card and copy  
 of Summons and Complaint.

cc: Honorable James M. Prestwood  
 Prestwood & Prestwood  
 Attorneys at Law  
 Prestwood Bldg.  
 Andalusia, Ala.

THE STATE OF ALABAMA

CIRCUIT COURT

COVINGTON COUNTY  
BALDWIN

To Any Sheriff of the State of Alabama—Greeting:

YOU ARE HEREBY COMMANDED TO SUMMON—

Bobby Lott, whose street address is 320 N. 19th Avenue, Hattiesburg,

Mississippi

to appear within thirty days from the service of this writ in the Circuit Court of said County, at the place of

holding the same, and plead, answer or demur to the complaint of Dennis Ray Breedlove, a minor

suing by his Father, C. T. Breedlove, as next friend

Witness my hand this 4 day of Oct 1961

Alice J. Luck, Clerk

COMPLAINT

DENNIS RAY BREEDLOVE, A  
MINOR SUING BY HIS FATHER,  
C. T. BREEDLOVE,  
AS NEXT FRIEND

Plaintiff.

vs.

BOBBY LOTT

Defendant.

COUNT ONE:

Plaintiff's Attorney.

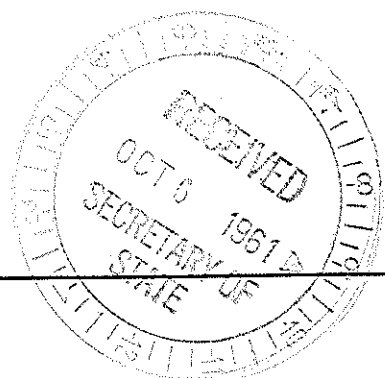
The plaintiff, a minor suing by his Father, C. T. Breedlove, as next friend claims of the defendant \$10,000.00 as damages for that on or wit October 28, 1960 while plaintiff was riding as a passenger in an automobile being driven on Highway No. 64, a public highway in Baldwin County, Alabama, at a point near Bell Forest when then and there the defendant so negligently operated another vehicle he was then driving as to cause the same to collide with the automobile in which plaintiff was riding and as a proximate result of the defendant's negligence the plaintiff received serious bodily injuries: he was bruised and concused; he was injured internally and externally; he was permanently injured; he suffered great pain and mental anguish and continues to suffer great pain and mental anguish; one of his knees was permanently injured and he has lost the full use of one leg; he was caused to incur medical, hospital and doctors' bills; he was permanently crippled; he suffered a great shock to his nervous system, all as a proximate result of the defendant's negligence. Wherefore plaintiff sues.

PRESTWOOD & PRESTWOOD

By Jean M. Prestwood  
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

Jean M. Prestwood  
Attorneys for Plaintiff



No. 4322

THE STATE OF ALABAMA

COVINGTON COUNTY

CIRCUIT COURT

Plaintiff.

vs.

Defendant.

SUMMONS AND COMPLAINT

Filed in office this \_\_\_\_\_ day of

FILED

, 19

OCT 4 1961

ALICE J. DUCK, CLERK  
REGISTERED

Clerk.

Plaintiff's Attorney

Received in office this \_\_\_\_\_ day of

, 19

Sheriff.

Executed this \_\_\_\_\_ day of

, 19, by

leaving a copy of the within Summons and Com-

plaint with \_\_\_\_\_

Defendant.

Sheriff.

Deputy Sheriff.

*Prestwood and Prestwood*  
ATTORNEYS AT LAW  
*Andalusia, Alabama*

JAMES M. PRESTWOOD  
ROGER A. PRESTWOOD  
HUGH L. PRESTWOOD

October 3, 1961

PRESTWOOD BUILDING  
TELEPHONE CA 2-1151

Circuit Clerk  
Baldwin County  
Bay Minette, Alabama

Dear Sir:

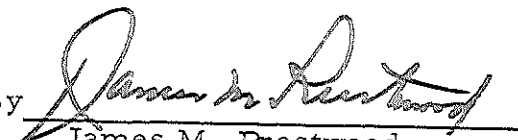
Re: Rita Faye Baker vs. Bobby Lott  
Dennis Ray Breedlove vs. Bobby Lott

Please file the enclosed summons and complaint.  
Service is to be perfected through the Secretary of State and  
our check for that item of expense is enclosed.

Thanking you, we are

Very truly yours,

PRESTWOOD AND PRESTWOOD

By   
James M. Prestwood  
P. O. Box 28  
Andalusia, Alabama

JMP:aw  
Enclosures

~~Wott~~ ~~St~~

Feb 23, 1963

Nonborn,

Re: Baker v. Wott  
Bredlow v. Wott

This is my consent  
for you to request Judge Hall  
to enter an order withdrawing  
the jury demand in the Wott  
cases, and I agree that  
you have judgments entered  
in each case, in accordance  
with our telephone conversation.

The release from the Parents  
will follow —

Sincerely,

James E. Pearson

THE STATE OF ALABAMA

CIRCUIT COURT

~~HOUSTON~~ COUNTY  
BALDWIN

To Any Sheriff of the State of Alabama—Greeting: YOUR ARE HEREBY COMMANDED TO SUMMON

Bobby Lott, whose street address is 320 N. 19th Avenue, Hattiesburg,

Mississippi

to appear within thirty days from the service of this writ in the Circuit Court of said County, at the place of

holding the same, and plead, answer or demur to the complaint of Dennis Ray Breedlove, a minor

suing by his Father, C. T. Breedlove, as next friend

Witness my hand this 4 day of Oct 1961

Alice J. Duck, Clerk

COMPLAINT

DENNIS RAY BREEDLOVE, A  
MINOR SUING BY HIS FATHER,  
C. T. BREEDLOVE, Plaintiff.  
AS NEXT FRIEND

vs.

BOBBY LOTT

Defendant.

COUNT ONE:

Plaintiff's Attorney.

The plaintiff, a minor suing by his Father, C. T. Breedlove, as next friend claims of the defendant \$10,000.00 as damages for that on to-wit October 28, 1960 while plaintiff was riding as a passenger in an automobile being driven on Highway No. 64, a public highway in Baldwin County, Alabama, at a point near Bell Forest when then and there the defendant so negligently operated another vehicle he was then driving as to cause the same to collide with the automobile in which plaintiff was riding and as a proximate result of the defendant's negligence the plaintiff received serious bodily injuries: he was bruised and contused; he was injured internally and externally; he was permanently injured; he suffered great pain and mental anguish and continues to suffer great pain and mental anguish; one of his knees was permanently injured and he has lost the full use of one leg; he was caused to incur medical, hospital and doctors' bills; he was permanently crippled; he suffered a great shock to his nervous system, all as a proximate result of the defendant's negligence. Wherefore plaintiff sues.

PRESTWOOD & PRESTWOOD

By James M. Prestwood  
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

James M. Prestwood  
Attorneys for Plaintiff

FILED

OCT 4 1961

Exp-10-6-61

192

ALICE J. DUCK, CLERK  
REGISTER



No. 4899

THE STATE OF ALABAMA  
COVINGTON COUNTY

CIRCUIT COURT

Lennis Ray Breedlove,  
a minor, suing by his father,  
C. J. Breedlove, as next friend  
Plaintiff.

vs.

Bobby Lett

Defendant.

SUMMONS AND COMPLAINT

Filed in office this \_\_\_\_\_ day of

FILED

OCT 4 1961

ALICE J. DUCK, CLERK  
REGISTER

Clerk.

Plaintiff's Attorney

1866  
RECEIVED IN OFFICE

Received in office this 1961 day of  
OCT 5

M. S. BUTLER, Sheriff

19

(3)

Sheriff.

Executed this \_\_\_\_\_ day of

\_\_\_\_\_, 19\_\_\_\_, by

leaving a copy of the within Summons and Com-

plaint with \_\_\_\_\_

The Sheriff claims 2  
miles at 10c per mile for a total  
of \$ 20

Defendant.

M. S. Butler, Sheriff  
Montgomery County, Ala.

Sheriff.

Deputy Sheriff.

Executed by serving 3 copies of  
the within on Betty Finch  
Secretary of State of The State of  
Alabama.

This the 6 day of Oct 1961

Sheriff of Montgomery County

M. S. Butler,

By Ramus D. S.