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RITA FAYE BAKER, a minor suing by		X		
Dale Baker, as ne		X	TN MYTE GIRONIAM GOVERN ON	
	Plaintiff,	Ĭ	IN THE CIRCUIT COURT OF	
vs.		X	BALDWIN COUNTY, ALABAMA	
BOBBY LOTT,		X	A 773 - T. A YIV	
Defendant.	Dofondont	X	AT LAW	
	berendant.	I		

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: Ohn Sarle Chason
Attorneys for Defendant

NOV 2 1961
ALCE J. DUCK, REGISTER

RITA FAYE BAKER, a minor suing by her father, Dale Baker, as next friend,

Plaintiff,

vs.

BOBBY LOTT,

Defendant.

PLEA

FILED

NOV 2 1961

ALICE J. DUCK, CLERK REGISTER

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

THE STATE OF ALABAMA

CIRCUIT COURT

EXINGION COUNTY BALDWIN

BALL

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 Rita Faye Baker, a Minor

Suing by Her Father, Dale Baker, As Next Friend

Witness my hand this

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COMPLAINT

RITA FAYE BAKER, A MINOR SUING BY HER FATHER, DALE BAKER, AS NEXT Plaintiff. FRIEND

BOBBY LOTT

Defendant.

COUNT ONE:

Plaintiff's Attorney.

The plaintiff, a minor suing by her Father, Dale Baker, 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; she was bruised and contused; she was made sick and sore; she was injured internally and externally; she suffered great pain and mental anguish and continues to suffer great pain and mental anguish; she was permanently injured; she suffered a great shock to her nervous system; she suffered a great loss of blood; her face was badly gashed and she is permanently disfigured; she was caused to incur medical, hospital and doctors' bills, all as a proximate result of the defendant's negligence. Wherefore plaintiff sues.

PRESTWOOD & PRESTWOOD

By_

Attorneys for Plaintiff

Plaintiff demands a trial by jury.

Attorneys for Plaintiff

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MINE I WILL CLERK

THE STATE OF ALABAMA

COVINGTON COUNTY

CIRCUIT COURT

Rita Face Baker, a misser sing by her jather Hale Baker, as next siend Plaintiff.

Bobby Lott

Defendant,

SUMMONS AND COMPLAINT

Filed in office this	day of
Filed in office this	tay or
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FHLED-	•
OCT 4 1961	
	Clerk.
ALIOF I DUOV CLERK	
ALIUL J. DUVII, REGISTER	

Plaintiff's Attorney

M. S. BU L.P. Sheriff. Executed this day of	Received in office	EQUE VED	day, of
M. S. BU LTR. Sheriff. Executed this day of , 19 , by leaving a copy of the within Summons and Complaint with The Sheriff claims 2 Defendant, the at 10c per mile for a total I.S. Sheriff. M. S. Butler, France.	Received in Other		10
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M. S. Builer, Charter	wes at 10c per	mile for a tot	
M. S. Butler, Property Country	13 26	9	Sheriff.
frontgomery County, Deputy Sheriff	M. S. Buil	er, filosofer	-
	Monigome	ty Coetily, Dep	uty Sheriff.

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By. (Connection of the State of the State of Montgomery County M. S. Butler,

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October 31, 1961

RITA FAYE BAKER, A MINOR SUING BY HER FATHER, DALE BAKER, AS NEXT FRIEND, Plaintiff VS

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

BOBBY LOTT, Defendant

CASE NO. 4900

TO THE CIRCUIT COURT OF BALDWIN COUNTY, Alabama:

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

October 6, 1961

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: RITA FAYE BAKER, A MINOR SUING BY HER FATHER, DALE BAKER, AS NEXT FRIEND, Plaintiff VS BOBBY LOTT, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
Case No. 4900 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 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 October 13, 1961 I received the return card, showing receipt by the designated addressee of the aforementioned matter at on Oct 11 1961

October 13, 1961 I received the return card, showing receipt by the designated addressee of the aforementioned matter at on Oct 11 1961

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

31

day

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 DALDWIN YOUR ARE HEREBY COMMANDED TO SUMMON. To Any Sheriff of the State of Alabama—Greeting: Bobby Lott, whose street address is 320 N. 19th Avenue, Hattlesburg, 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 Rica Paye Baker, a Minor Suing by Her Father, Dale Baker, As New Friend Witness my hand this COMPLAINT RITA FAYE BAKER, A MINOR DOBBY LOTT SULMO BY HUR PATHUR, DALE Defendant. DAKER, AS RESEL Plaintiff. FRIEND CCIDIT ONE: Plaintiff's Attorney.

The plaintiff, a minor suing by her Father. Date Baker, as next friend claims of the defendant \$10,000.00 as damages for that on to-wit October 28, 1960 white 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 bedily injuries; she was bruised and continued the made made sick and sore; she was injured internally and externally; she suffered great pain and mental anguish and continues to suffer great pain and mental anguish; she was permanently injured; the suffered a great shock to her nervous system; she suffered a great loss of blood; her face was badly gashed and she is permanently disfigured; she was caused to incur medical.

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