

4930  
RITA FAYE BAKER,  
a minor suing by her father,  
Dale Baker, as next friend,

Plaintiff,

vs.

BOBBY LOTT,

Defendant,

X

X

X

X

X

X

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  
Attorneys for Defendant

FILED

NOV 2 1961

ALICE J. DUCK, CLERK  
REGISTER

4900

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

~~LOWENSON~~ 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 Rita Faye Baker, a Minor

Suing by Her Father, Dale Baker, As Next Friend

Witness my hand this 4 day of Oct 1961.

*Alice J. Duck*, Clerk

COMPLAINT

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

vs.

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 *James M. Prestwood*  
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

*James M. Prestwood*  
Attorneys for Plaintiff

FILED

OCT 4 1961

194

*Ed-10-6-61*  
ALICE J. DUCK, CLERK  
REGISTER

No. 4900

THE STATE OF ALABAMA  
COVINGTON COUNTY

CIRCUIT COURT

Rita Inge Baker, a minor  
suing by her father  
W. L. Baker, as next friend  
Plaintiff.

vs.

Bobby Lott

Defendant.

SUMMONS AND COMPLAINT

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

**FILED**

, 19\_\_

OCT 4 1961

Clerk.

ALICE J. DUCK, CLERK  
REGISTER

Plaintiff's Attorney

1865

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

RECEIVED IN OFFICE  
OCT 5 1961  
M. S. BUTLER, Sheriff.

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

, 19\_\_, by

leaving a copy of the within Summons and Com-

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

The Sheriff claims \_\_\_\_\_ Defendant.

miles at 10c per mile for a total

of \$ \_\_\_\_\_ Sheriff.

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

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

(This is 6 day of Oct 1961)

Sheriff of Montgomery County

M. S. Butler,

By Ramsey D. S.

October 31, 1961

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

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA

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 SUIING 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 6  
day of October 1961

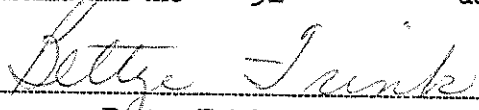
Enclosure (1)

(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 October 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  
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

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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 4 day of Oct. 1966

Alice J. Luck, Clerk

COMPLAINT

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

Plaintiff.

vs.

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, 1966 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 James M. Prestwood  
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

James M. Prestwood  
Attorneys for Plaintiff

