

OSCAR ARD, A Minor,  
by LAURA BELL LINTON  
as his next friend,

Plaintiff,

vs.

ALBERT W. BERGMAN, III,

Defendant.

§

IN THE CIRCUIT COURT OF

§

§

BALDWIN COUNTY, ALABAMA

§

LAW SIDE

§

§

§

5721

Comes the Defendant in the above styled cause and for plea  
to the complaint filed in said cause, says:

1. Not guilty.



Attorneys for Defendant

OSCAR ARD, A Minor, by  
LAURA BELL LINTON, as his  
next friend,

Plaintiff,

vs

ALBERT W. BERGMAN, III,

Defendant

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

PLEA

\* \* \* \* \*

FILED

SEP 20 1963

ALICE J. DUCK, CLERK  
REGISTER

OSCAR ARD, a Minor, by LAURA  
BELL LINTON, His Next Friend

PLAINTIFF

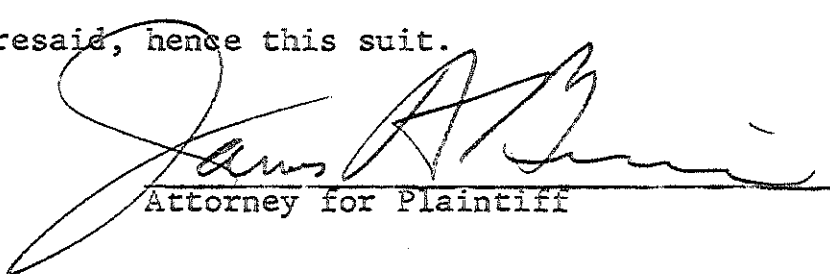
VS

ALBERT W. BERGMAN, III

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

The Plaintiff, Oscar Ard, suing by his sister and next friend, Laura Bell Linton, claims of the Defendant Five Hundred and NO/100 Dollars (\$500.00) as damages, for that heretofore on, to-wit, the 25th day of December, 1962 the Defendant, Albert W. Bergman, III, so negligently operated a motor vehicle westwardly on U. S. Highway 98 at a point four-fifths (4/5) of a mile east of the intersection of said U. S. Highway 98 and Baldwin County Road #27, both public highways, in Baldwin County, Alabama, so as to cause or allow said vehicle to collide with a motor vehicle in which Plaintiff was riding as a passenger and which said motor vehicle in which Plaintiff was riding as a passenger was then and there proceeding eastwardly on said U. S. Highway 98, and as a direct and proximate result of the negligence of the Defendant Albert W. Bergman, III., the Plaintiff received severe contusions, cuts and abrasions in and about the back and both shoulders, was made sick and sore, and was caused to suffer great physical and mental anguish, and was caused to incur expenses of doctors, hospitals, nurses, x-rays and drugs in and about the care and treatment of his said wounds as aforesaid, hence this suit.

  
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. ....

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

Albert W. Bergman, III

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 .....

Albert W. Bergman, III ....., Defendant.....

by Oscar Ard, a Minor, by Laura Bell Linton, His Next Friend.....

....., Plaintiff.....

Witness my hand this.....

20

day of.....

Sept

1963

Eric J. Lusk

....., Clerk

No. 572-1

Page \_\_\_\_\_

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Oscar Ard, a Minor, by Laura

Bell Linton, His Next Friend

Plaintiffs

vs.

Albert W. Bergman, III

Defendants

**Summons and Complaint**

Filed \_\_\_\_\_

**FILED**

19\_\_\_\_

SEP 20 1963

Clerk

**ALICE I. DUCK,**

**CLERK  
REGISTERED**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

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

Sheriff.

I have executed this summons

this \_\_\_\_\_

19\_\_\_\_

by leaving a copy with

Sheriff.

Deputy Sheriff.

American Oil Company

VS  
Leo Keith, et al

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

CASE NO. 5722

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on September 25, 1963  
I sent by certified mail in an envelope addressed as follows:

Leo Keith  
Ellisville, Miss.

"Certified 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:

"  
Leo Keith  
Ellisville, Miss.

You will take notice that on September 25, 1963 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: AMERICAN OIL COMPANY, a Maryland Corporation, Plaintiff VS LEO KEITH, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW  
Case No. 5722 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 25th  
day of September, 1963

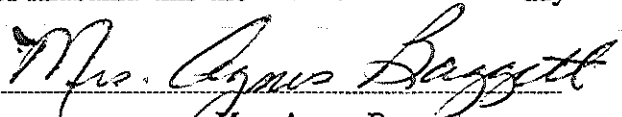
Enclosure (1)

(Signed) Mrs. Agnes Baggett  
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 1, 1963 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Ellisville, Miss  
on Sept. 30, 1963

WITNESS MY HAND and the Great Seal of the State of Alabama this the 1st day  
of October, 1963

  
Mrs. Agnes Baggett  
Secretary of State

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

Hon. J. R. Owen  
110 Court House Sq.  
Bay Minette, Ala.