

DOUGLAS KENNEDY, a Minor,  
who sues by J. E. KENNEDY,  
JR., His Father and Next  
Friend,

Plaintiff,

vs.

CALVIN H. KING and W. H.  
KING,

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

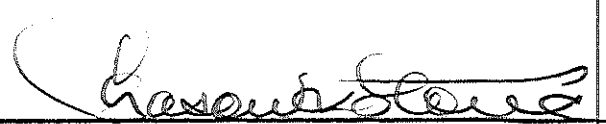
AT LAW

NO. 5452

PLEA

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

1. Not guilty.

  
Attorneys for Defendants

FILED

APR 29 63

ALICE J. DICK, CLERK  
REGISTER

545<sup>2</sup>

DOUGLAS KENNEDY, a Minor,  
who sues by J. E. KENNEDY,  
JR., His Father and Next  
Friend,

Plaintiff,

vs

CALVIN H. KING and W. H.  
KING,

Defendants.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. \_\_\_\_\_

\* \* \* \* \*

PLEA

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DOUGLAS KENNEDY, a minor,  
who sues by J. E. KENNEDY,  
JR., His Father and Next  
Friend,

Plaintiff,

vs.

CALVIN H. KING and W. H.  
KING,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. \_\_\_\_\_

DEMURRER:

Come the Defendants in the above styled cause and demur to  
the complaint filed in said cause and assign the following separate  
and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That the place where the accident occurred is not sufficiently set out.
3. That said complaint does not allege any duty owing by  
the Defendants to the Plaintiff.

  
Attorneys for Defendants

DOUGLAS KENNEDY, a minor,  
who sues by J. E. KENNEDY,  
JR., his Father and Next  
Friend,

Plaintiff,

vs

CALVIN H. KING and W. H.  
KING,

Defendants

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW NO. \_\_\_\_\_

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DEMURRER

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FILED

MAR 5

ALICE L. DICK, CLERK  
JAMES H. DICK, JUDGE

DOUGLAS KENNEDY, a Minor,  
who sues by J. E. KENNEDY, JR.,  
His Father and Next Friend,

Plaintiff,

VS.

CALVIN H. KING AND

W. H. KING,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 5452

C O U N T   O N E

The plaintiff claims of the defendants the sum of TWO THOUSAND FIVE HUNDRED AND NO/100ths (\$2,500.00) DOLLARS, as damages, for that, heretofore, on, to-wit: the 29th day of November, 1962, at about 7:15 o'clock, P. M., while the plaintiff was a passenger in an automobile on a public highway in Baldwin County, Alabama, to-wit: the Styx River Road, about .5 of a mile East of Stapleton, Alabama, the defendant, Calvin H. King, who was then and there an agent, servant or employee of the defendant, W. H. KING, acting within the line and scope of his employment as such, so negligently operated an automotive vehicle which he was then and there driving as to cause, permit or allow said vehicle to run into, upon, or against plaintiff's said automobile, and, as a proximate consequence thereof, plaintiff sustained the following injuries and damages, to-wit:

Plaintiff's face was lacerated and bruised; his chin was cut, requiring three stitches to close the wound; his head was painfully injured; he was made sick, sore, lame and disordered; his right thigh was painfully bruised; his right knee was sprained and bruised; and he was permanently injured; and was caused to be put to great expense and inconvenience for medical attention, doctor's bills, x-rays, hospital bills and other medical treatment and expenses, in an effort to heal and cure his said injuries; all to his damage as aforesaid;

And Plaintiff avers that he sustained all of his aforesaid injuries and damages as a proximate result and consequence of the negligence of the defendant, CALVIN H. KING, who was an agent, servant, or employee of the defendant, W. H. KING, acting within the line and scope of his employment as such, in that the defendant, CALVIN H. KING, negligently caused, permitted, or allowed, said automotive vehicle, which he was then and there operating to run into, upon or against the

automobile in which plaintiff was a passenger; hence this suit.

Joseph J. Maslowski  
ATTORNEY FOR PLAINTIFF.

Plaintiff demands a jury trial of this cause.

Joseph J. Maslowski  
ATTORNEY FOR PLAINTIFF.

FILED

FEB 6 1963

ALICE J. DUCK, CLERK  
REGISTER

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW. NO. \_\_\_\_\_

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DOUGLAS KENNEDY, A Minor,  
who sues by J. E. KENNEDY,  
JR., his Father and Next  
Friend,

Plaintiff,

VS.

CALVIN H. KING AND  
W. H. KING,

Defendants.

\*\*\*\*\*

COMPLAINT.

Defendants live at Stapleton,  
Alabama.

FILED

FEB 6 1963

ALICE J. DUCK, CLERK  
REGISTER

*We the Jury find in favor of  
the plaintiff;  
J. H. Chapin*

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. ~~53~~ 5452

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Calvin H. King and W.H. King

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

Calvin H. King and W.H. King, Defendant

by Douglas Kennedy, a minor who sues by J.E. Kennedy, Jr., his father and

next friend, Plaintiff

Witness my hand this 6th day of February 1963

W. J. Smith, Clerk



No. 5452

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

DOUGLAS KENNEDY, a Minor who sues  
by J.E. KENNEDY, JR., his father

and next friend,

Plaintiffs

vs.

CALVIN H. KING AND W.H. KING

Defendants

SUMMONS and COMPLAINT

Filed February 6, 1963

Alice J. Duck, Clerk

Telfair J. Mashburn

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

February 6, 1963  
Feb. 14, 1963, Sheriff

I have executed this summons

this Feb 8, 1963

by leaving a copy with

W. H. King  
Calvin King 2-18-63

Sheriff claims

miles at

Ten Cents per mile Total \$ 2.00  
TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

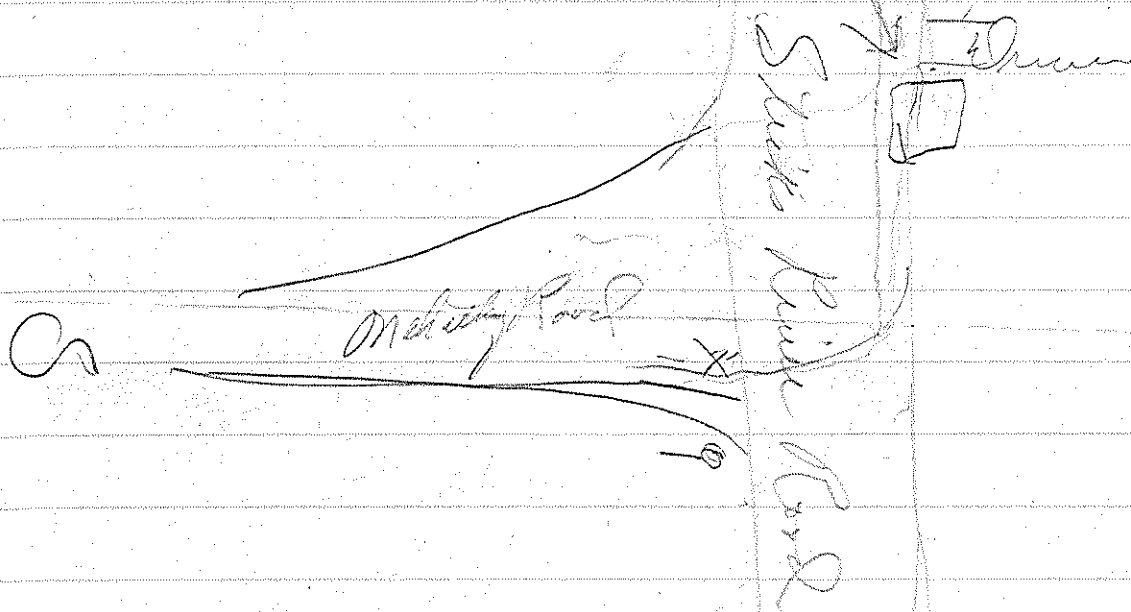
Taylor Wilkins Sheriff  
W. O. Garner Deputy Sheriff  
Stapleton

Pl + Def  
Exhibit 1

XX

Japan

muw



AMERICAN BOARD OF  
OBSTETRICS AND GYNECOLOGY

THE WOMAN'S CLINIC  
MOBILE, ALABAMA

AMERICAN COLLEGE OF  
OBSTETRICIANS AND GYNECOLOGISTS

GEORGE J. MITCHELL, M.D.  
FREDERICK B. JONES, M.D.

Sept, 10, 1963

TO WHOM IT MAY CONCERN:

This is to certify that Mrs. R. L. Wilson (Norma) is a patient under my care and treatment for pregnancy. She is now 30 weeks pregnant and expects to deliver Oct. 10, 1963. Mrs. Wilson is subject to miscarriage, and has to have shots during her pregnancy to help carry the baby and I have advised her that it would be detrimental to her health and the completion of her pregnancy if she goes to court. She should not be subjected to any emotional strain, and has been advised to remain at home.

Sincerely,

  
G. J. Mitchell, M. D.