

PATTIE C. PROPST,

Plaintiff,

vs.

DONALD NEIL PERKINS,

Defendant,

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5458

PLEA:

Comes now the Defendant in the above styled cause, and for answer to the complaint heretofore filed in said cause, pleads, separately and severally, as follows:

1. Not guilty.

CHASON & STONE

By:

John Earle Chason
Attorneys for Defendant

FILED
JUL 12 1963
ALICE I. DUCK, CLERK
REGISTER

- 5458
5459
Propst
VS
Perkins
1. Beck, Charles C., Businessman, Lillian
 2. Blalock, Greene C., Carpenter, Fairhope
 3. Bloch, Herman, Farmer, Elberta
 4. Malone, T.E., Merchant, Fairhope
 5. Mason, Jimmy, Salesman, Fairhope
 6. Mosley, Rufus, Farmer, Stapleton
 7. Eslava, Clarence, Farmer, Mag. Spgs.
 8. Haden, James T., Salesman, Robertsdale
 9. Quinley, Wilburn, Farmer, Bay Minette
 10. Rhodes, Charles R., Farmer, Foley
 11. Rhodes, Larkin T., Jr., Farmer, Bay Minette
 12. Rieben, Ray, Paper Mill, Bay Minette
 13. Roberson, Mutt, Laborer, Robertsdale
 14. Lazzari, Anglo, Farmer, Belforest
 15. Lazzari, Joe, Jr., Farmer, Belforest
 16. Lazzari, John, Farmer, Belforest
 17. Lager, J.E., Salesman, Foley
 18. Little, W.F., Mgr. Bell Tele. Commercial, Spanish Fort
 19. Robinson, Dale L., Ins. Agt., Foley
 20. Sanders, E. Frank, Banker, Foley
 21. Andress, Herbert E., Farmer, Foley
 22. Dickey, O.L., Butcher, Robertsdale
 23. Crosby, James W., Bookkeeper, Foley
 24. Arnould, M.L., Floor Finisher, Robertsdale
 25. Barton, John, Jr., Newport, Bay Minette
 26. Thompson, Albert M., Merchant, Bay Minette
 27. Wenzel, Emmett O., Merchant, Gulf Shores
 28. Woodward, C.H., Merchant, Fairhope
 29. Wright, Justice D., Forester, Stapleton
 30. Boan, Jessie Forest, Farmer, Stapleton
 31. Bung, Floyd, Merchant, Fairhope
 32. Oblak, John, Jr., Farmer, Silverhill
 33. Leiterman, Nick, Civil Service, Elberta
 34. Smith, Clinton, Defense Worker, Bay Minette
 35. Suddith, Jack, Officer Manager, Bay Minette
 36. Bosby, Eugene, Construction Worker, Fairhope
 37. Bryant, Nathan, Clerk, Fairhope
 38. Denton, Alphonse, Carpenter, Fairhope
 39. Lamar, Reuben, Laborer, Foley
 40. McReynolds, Leon, Labor Worker, Bay Minette
 41. Moore, Jessie, Court House, Bay Minette
 42. Wilson, Frank E., Brookley Field, Daphne
 43. Tullos, Abe, Brookley Field, Fairhope
 44. Nix, C. Herbert, Reserve Fleet, Bay Minette

P XXXXX XXXX

D XXXXX XXXX

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STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Donald Neil Perkins, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the Complaint of Pattie C. Propst.

Witness my hand, this the 7 day of February, 1963.

Miss J. J. Clark
Clerk

PATTIE C. PROPST,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
DONALD NEIL PERKINS,	X	AT LAW
Defendant.	X	CASE NO. <u>5458</u>


1.

Plaintiff claims of the Defendant, Donald Neil Perkins, the sum of Five Thousand Dollars (\$5,000.00) as damages for that on to-wit, the 19th day of October, 1962, the Defendant was driving his automobile along or upon a public road in Baldwin County, Alabama, known as the Old Pensacola Road, and also known as Alabama Highway 112, at a point approximately 2.9 miles East of the city limits of Bay Minette, Alabama; said point being in Baldwin County, Alabama; that the Defendant so negligently operated the motor vehicle which he was driving at said time and place as to cause or allow the same to run into, upon or against the automobile which the Plaintiff was riding, and as a proximate consequence and result of said negligence, the Plaintiff was injured in that: She received lacerations on the right side of her head, multiple abrasions on both legs, the muscles of her neck and back were twisted and bruised, and her vision was impaired. She was caused to suffer much mental and physical anguish and pain as a result of her injuries, all to the loss of the Plaintiff in the aforesaid amount.

Plaintiff claims of the Defendant, Donald Neil Perkins, the sum of Five Thousand Dollars (\$5,000.00) as damages for that on to-wit, the 19th day of October, 1962, the Defendant was driving his automobile along or upon a public road in Baldwin County, Alabama, known as the Old Pensacola Road, and also known as Alabama Highway 112, at a point approximately 2.9 miles East of the city limits of Bay Minette, Alabama; said point being in Baldwin County, Alabama; that the Defendant so negligently operated the motor vehicle which he was driving at said time and place as to cause or allow the same to run into, upon or against the automobile which the Plaintiff was riding, and as a proximate consequence and result of said negligence, the Plaintiff was injured in that: She received lacerations on the right side of her head, multiple abrasions on both legs, the muscles of her neck and back were twisted and bruised, and her vision was impaired. She was caused to suffer much mental and physical anguish and pain as a result of her injuries; that she was permanently injured, all to the loss of the Plaintiff in the aforesaid amount.

WILKERS & BRANTLEY

BY:


 Attorney for Plaintiff

Plaintiff demands a trial by jury.

WILKERS & BRANTLEY

BY:


 Attorney for Plaintiff

FILED

FEB 7 1963

ALICE I. DUCK, CLERK
REGISTER

64-3-28-62

5458

Pattie C. Propst
Plt.

vs.
Donald Neil Perkins
Def.

CLERK OF DISTRICT COURT
JANUARY 3 1963

FILED
FEB 7 1963
ALICE I. DICK, CLERK
REGISTER

Received 7 day of Feb. 1963
and on 28 day of May 1963
I served a copy of the within Stro
on Donald Neil Perkins

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot D.
5 miles West of B!

Sheriff claims 10 miles at
Ten Cents per mile Total \$ 1.00
TAYLOR WILKINS, Sheriff
BY _____
DEPUTY SHERIFF

James Earl Ray
the fund for