

WOODROW ARNOLD WALKER, a
minor who sues by and through
his parent and next of friend
MAMIE WALKER,

Plaintiff,

Vs.

THE CITY OF FOLEY, ALABAMA,
a municipal corporation,

Defendant.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW

)

) CASE NO. 5884

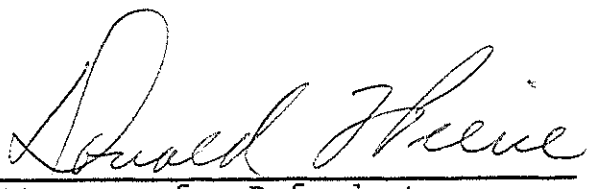
)

A N S W E R

Comes now the defendant in the above-styled cause,
the City of Foley, Alabama, a municipal corporation, and for
separate and several answer to each count of the complaint
heretofore filed sets down and assigns the following separate
and several pleas:

ONE

Not guilty.


Attorneys for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

DEC 23 1963

ALICE J. DUCK, CLERK
REGISTER

WOODROW ARNOLD WALKER, a Minor,
by MAMIE WALKER, His Next Friend

PLAINTIFF

VS

CITY OF FOLEY, ALABAMA,
a municipal corporation

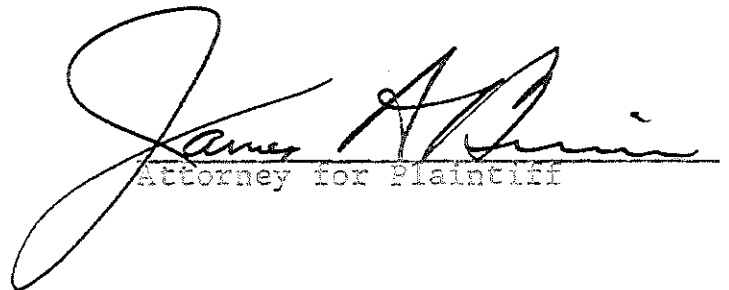
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, NO. 5884

The Plaintiff, Woodrow Arnold Walker, suing by his mother and next friend, Mamie Walker, claims of the Defendant Five Hundred and NO/100 (\$500.00) Dollars for that heretofore on, to-wit: the 25th day of May 1963, defendant was engaged in the business of operating a swimming pool at New City Park, Foley, Baldwin County, Alabama, and that plaintiff was swimming at said pool; that on said day and date the defendant so negligently conducted its said business as to provide a slick, slippery and non-friction-type diving board that as a consequence thereof plaintiff slipped from said board while in the act of diving into said pool, and plaintiff received serious personal injuries in this, to-wit: contusion of the scalp; fracture, tibia and fibula, lower third, compound; left olecranon and left radial neck; for all of which he claims damages in the sum aforesaid, hence this suit.


Attorney for Plaintiff

*Service accepted for defendant by
its attorney, Donald Pierce
Dec. 23, 1963*

FILED

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REGISTER