

ALLEN ROWLAND, a minor who : IN THE CIRCUIT COURT OF
sues by and through his
father, AUBURN C. ROWLAND, :

Plaintiff

BALDWIN COUNTY, ALABAMA

vs.

: AT LAW

WALTER PRESTON NEWMAN, III :
and HARLEY D. PIERSON,
jointly and severally, :

Defendants.

: CASE NO.


5920

A N S W E R

Come now the defendants in the above-styled cause,
Walter Preston Newman, III and Harley D. Pierson, jointly
and severally, and for answer to the complaint heretofore
filed and each count thereof, sets down and assigns,
jointly and severally the following pleas:

O N E

Not guilty.


Attorney for Defendants

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

FEB 6 1964

ALICE J. DUCK, CLERK
REGISTER

Please furnish Mr. _____ the following report regarding my condition.

Signed _____

(To be detached and retained by reporting physician if desired)

MEDICAL REPORT

Date Dec. 12 1963 FILE NUMBER _____
Name of Patient Allen Rowland Occupation _____
Address Box 178 Stapleton, Ala. Employer _____ Age 7
Date of Accident July 22 1963 History as Stated Auto hit motor bike, patient was riding
By Patient _____

Date of Your First Treatment July 22 1963 Who Engaged Your Services? _____
Treatment Given by You? Hospitalized, Debridement & Open Reduction of Fractures, Sutured Laceration
Were X-Rays Taken? Yes By Mattie L. Rhodes Hospital 7-22, 7-31, 8-7, 8-14, 8-26, 9-7, 9-20, 10-3, 10-19, 12-1
Whom? _____ (NAME AND ADDRESS) Date _____
Was Patient Treated by Anyone Else? No By _____
Whom? _____ (NAME AND ADDRESS) Date _____
If Patient Hospitalized Name and Address of Hospital Mattie L. Rhodes Hospital Bay Minette, Ala.
Is Further Treatment Needed? Probably For How Long? Undetermined at present
Nature and Extent of Treatment Needed Patient will probably have physio therapy on foot

DIAGNOSIS: (Describe and Locate Character and Extent of Injury) Compound Fracture of 2nd, 3rd, 4th, & 5th Metatarsals, Left Foot
Large Laceration of Left Foot

CONTRIBUTING FACTORS: (Is Disability a Result of Above Described Accident Solely? State Fully) Yes

Total Disability Estimate _____ Weeks _____ Days _____ Ended Cast removed on Oct. 3 1963
Partial Disability Estimate _____ Weeks _____ Days _____ Ended _____
My Charges to Date \$ 125.00 My Total Charges Are or Will Be \$ _____
Hospital Charges to Date \$ 232.40 Estimated Total Hospital Charges \$ _____

(Attach Itemized Bills and Invoices to Support All Charges)

Signed _____

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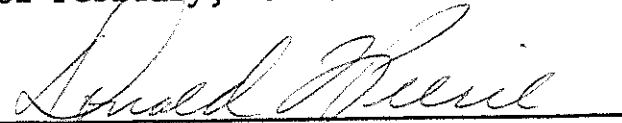
Defendants. : CASE NO. _____

C O M P L A I N T

Plaintiff claims of the defendants the sum of NINE
HUNDRED AND NO/100 DOLLARS (\$900.00) as damages for that
heretofore on, to-wit July 22, 1963 while the plaintiff
was riding as a passenger on a motor vehicle on U. S. Highway
31 in Baldwin County, Alabama in or near the town of Staple-
ton, Alabama, said highway being a public highway at said
time and place, the defendant Walter Preston Newman, III,
an agent, servant or employee of defendant Harley D. Pierson
and while acting within the line and scope of his agency,
service or employment as such did so negligently operate
an automobile upon said public highway as to run onto,
upon and over said minor plaintiff and he was injured and
damaged as follows: He received a compound fracture of
the left foot, laceration of the left foot and he suffered
physical pain and mental anguish for all of which he sues
and claims damages as aforesaid.


AUBURN C. ROWLAND

Service accepted for defendants Walter Preston Newman,
III and Harley D. Pierson by Donald F. Pierce, Esq., their
attorney on the 6th day of February, 1964.


Donald F. Pierce

FILED

FEB 6 1964

ALICE L. DUCK, CLERK
REGISTER