

LONNIE DeVAN YOUNCE, a minor  
suing by his father and next  
friend, HARVEY E. YOUNCE,

Plaintiff,

VS.

LARRY ORR,

Defendant.

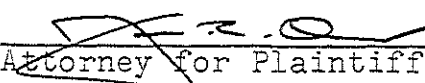
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

5-983

COMPLAINT

The plaintiff claims of the defendant the sum of FIVE HUNDRED DOLLARS (\$500.00) for that heretofore on to-wit, December 19, 1963, while the plaintiff was riding and operating a motorcycle on U. S. Highway 98 in Elberta, Alabama, directly in front of the Gulf Service Station at a place where he had a right to be, the defendant so negligently operated a motor vehicle so as to cause it to run into, upon, or against the motorcycle of the plaintiff and as a proximate result to the negligence of the said defendant the plaintiff was injured and damaged; he was put to great expense for doctor and medical bills; his limbs and body were bruised and made sore; he was injured and permanently injured and he was caused to suffer mental anguish all to his damage as aforesaid, hence this suit.

  
Attorney for Plaintiff

LONNIE DEVAN YOUNCE, a MINOR  
SUIING BY AND THROUGH HIS FATHER  
AND NEXT FRIEND, HARVEY E. YOUNCE,

Plaintiff,

vs

LARRY ORR

Defendant.

) IN THE CIRCUIT COURT

) OF BALDWIN COUNTY

) ALABAMA

) NO \_\_\_\_\_


Come now Larry Orr, a Minor and A. S. Orr, his Father, through  
Walter M. Cook, their attorney, and accept service of the plaintiff's  
complaint in this cause.

And for answer to the plaintiff's complaint the defendant says  
as follows:

1. He denies the material allegations.
2. That he is not guilty.

LYONS, PIPES AND COOK

By

  
Walter M. Cook, Attorney and Guardian  
Ad Litem for Larry Orr