

COMPLAINT

DELL A. BURKE, As Administrator of the Estate of JEWELL BELL BURKE, Deceased,	¶	
	¶	
Plaintiff,	¶	IN THE CIRCUIT COURT OF
	¶	
versus	¶	BALDWIN COUNTY, ALABAMA
	¶	
JACKIE DURICK HUBBART and CLYDE V. HUBBART,	¶	AT LAW
	¶	NO: <u>5460</u>
Defendants.	¶	

The Plaintiff claims of the Defendants the sum of One Thousand and No/100 Dollars (\$1,000.00) as damages for that heretofore on, to-wit: the 20th day of December, 1962, the Defendant Jackie Durick Hubbard, the agent, servant or employee of the Defendant Clyde V. Hubbard, and who was then and there acting within the line and scope of his employment as such, so negligently operated a motor vehicle on Alabama Highway No. 59, a public highway in Baldwin County, Alabama, at the intersection thereof with Baldwin County Highway 34, as to cause or allow the same to run into, upon and against a motor vehicle being then and there operated by the Plaintiff's intestate, and as a proximate consequence and result of the negligence of the Defendant Jackie Durrick Burke, aforesaid, the Plaintiff's intestate received severe personal injuries from which she died; wherefore Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

**FILED**  
FEB 8 1963  
ALICE L. DICK, CLERK  
REGISTER

By:   
Attorneys for Plaintiff

DELL A. BURKE, As Administrator  
of the Estate of JEWEL BELL BURKE,  
Deceased,

Plaintiff,

-vs-

JACKIE DURICK HUBBART and  
CLYDE V. HUBBART,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

CASE NO. 5460

Comes now the defendants and for answer to the plaintiff's  
complaint in this cause, says as follows:

1. Not guilty.
2. The material allegations of the complaint are untrue.

LYONS, PIPES AND COOK  
Attorneys for the Defendants.

By: Walter M. Cook

Walter M. Cook

~~CERTIFICATE OF SERVICE~~  
~~I do hereby certify that I have on this 31~~  
~~day of Jan 1963, served~~  
~~copy of the foregoing pleading on counsel for all~~  
~~parties to this proceeding by mailing the same~~  
~~by United States mail, properly addressed and~~  
~~first-class postage prepaid.~~  
~~Walter M. Cook~~

FILED

FEB 8 1963

ALICE I. DICK, CLERK  
REGISTER