

STATE OF ALABAMA

IN THE CIRCUIT COURT - AT LAW

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon David L. Wallace 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 Edna G. Brown, a minor, suing by Harmon Brown as her Father and next Friend.

Witness my hand this 28 day of April, 1964.

  
Clerk

EDNA G. BROWN, a Minor,  
suing by HARMON BROWN as  
her Father and next Friend,

Plaintiff,

vs.

DAVID L. WALLACE,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

6035

COUNT ONE

The Plaintiff claims of the Defendant the sum of One Thousand Five Hundred Dollars (\$1,500.00) as damages for that on, to-wit: February 8, 1964, on Baldwin County Road #68, at a point 4.2 miles East of the intersection of Highway #59 with said County Road #68, the Defendant negligently parked a pickup truck, in the night time, without proper lights on the same, and the automobile in which the said Edna G. Brown was riding as a passenger ran into or against such parked vehicle and as a proximate result of the negligence of such Defendant the Plaintiff was injured in this: her ribs on her right side were fractured; there were numerous

lacerations on her face and some of her teeth were cracked and broken, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

*Wm. H. Hoxon*  
Attorneys for Plaintiff

FILED

APR 23 1964

ALICE L. DUCK, CLERK  
REGISTER

EDNA G. BROWN, a Minor, suing  
by HARMON BROWN, as her Father  
and next Friend,

Plaintiff,

vs

DAVID L. WALLACE,

Defendant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

\* \* \* \* \*

EDNA G. BROWN, a Minor,  
suing by HARMON BROWN as  
her Father and next Friend,

Plaintiff,

VS

DAVID L. WALLACE,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the <sup>Defendant</sup>~~Plaintiff~~ in the above styled cause and  
for answer to the Plaintiff's complaint says as follows:

1. Not guilty.

FILED

APR 28 1964

Alice L. Duck, CLERK  
REGISTER

*W. H. Hays*  
Attorney for Defendant