

ANTHONY COOPER, a Minor,
suing herein by GEORGE
T. COOPER, as his father
and next friend,

Plaintiff,

vs.

JOSEPH JOHN SOPR and
JOSEPH SOPR, SR.,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


Case No. 6059

P L E A S

Come now the Defendants and offer the following pleas to the
Plaintiffs complaint and to each and every count thereof, separately
and severally;

ONE: The Defendants for answer to the complaint say they are not
guilty of the matters alleged therein.

General issue.


Attorney For Defendant

FILED

MAY 10 1964

ALICE J. DUCK, CLERK
REGISTER

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COUNT ONE:

The Plaintiffs claim of the Defendants the sum of SEVEN HUNDRED FIFTY (\$750.00) DOLLARS, for that on, to-wit, February 21, 1964, the Defendant, Joseph Sopr, Sr., who was then and there acting within the line and scope of his employment as such, so negligently operated an automobile, owned by the Defendant John Sopr, Sr., upon a public street, in the town of Robertsdale, Baldwin County, Alabama, to-wit, on College Avenue, so as to cause or allow the said automobile to run into, upon, or against the Plaintiff, Anthony Cooper, and as a proximate result and consequence of the negligence of the Defendants aforesaid, the Plaintiff, Anthony Cooper, suffered head and back injuries of the body and bruises of the body, in the amount sued for, hence this suit.

FILED

MAY 18 1964

ALICE J. DUCK, CLERK
REGISTER


Attorney For Plaintiff

PARENT'S OR GUARDIAN'S RELEASE AND INDEMNIFYING AGREEMENT

For and in consideration of the payment to me/us at this time of the sum of \$ Seven Hundred Fifty + no Dollars, the receipt of which is hereby acknowledged, I/we, the undersigned, father and/or mother and/or guardian of Charles Anthony Cooper (age 7) a minor do forever release, acquit, discharge and covenant to hold harmless Joseph John Lopez & Joe Lopez its or their heirs, successors and assigns of and from any and all actions, causes of action, claims, demands, damages, costs, loss of services, expenses and compensation, on account of, or in any way growing out of, any and all known and unknown personal injuries and property damage which we may now or hereafter have as the parents and/or guardian of the said minor, and also all claims or rights of action for damages which the said minor has or may hereafter have, either before or after he or she has reached (his) (her) majority, resulting or to result from a certain accident which occurred on or about the 21st day of February 1964 at or near Robertsdale, Alabama

I/we further promise and bind ~~myself~~/ourselves jointly and severally, ~~my~~/our heirs, administrators and executors to repay to the said Releasee, its or their heirs, successors and assigns any sum of money, except the sum above mentioned that ~~he/she~~/they may hereafter be compelled to pay because of said accident.

It is further understood and agreed that this settlement is the compromise of a doubtful and disputed claim, and that this payment is not to be construed as an admission of liability on the part of the Releasee, by whom liability is expressly denied.

I/we further state that I/we have carefully read the foregoing release and know the contents thereof, and I/we sign the same as ~~my~~/our own free act.

WITNESS MY hands and seals this 24th day of March 1964, in presence of

CAUTION: READ BEFORE SIGNING

George T. Cooper (SEAL)

Mary Kay Cooper (SEAL)

State of Alabama

County of Baldwin

On this 24th day of March, 1964, before me personally appeared George T. Cooper to me known to be the person described herein, and who executed the foregoing instrument and he acknowledged that he voluntarily executed the same.

Rodney M. Akers
Notary Public

My Commission Expires Sept. 20, 1965

My Term expires _____, 19____.

(If this release is acknowledged before a Notary Public, no witnesses' signatures are necessary.)

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