

INSTRUCTIONS

SENDER: WRITE (OR TYPE) MESSAGE, PULL OUT YELLOW SHEET, MAIL THE OTHER TWO.  
RECIPIENT: WRITE YOUR REPLY AT BOTTOM, MAIL BACK WHITE SHEET AND KEEP THE PINK.

FROM

**JOHN V. DUCK  
& RICHARD S. LASTY**  
Attorneys at Law  
317 Alabama Avenue  
BAY MINETTE, ALABAMA

*Message Reply*

DATE: January 18, 1965

**PRIORITY**

URGENT!

SOON AS POSSIBLE

NO REPLY NEEDED

FILE NO:

ATTENTION:

TO

Mrs. Alice J. Duck  
Clark, Circuit Court  
Bay Minette, Alabama

SUBJECT:  
  
LANGFORD vs. HANCOCK  
Cases Nos. 6080 & 6081

MESSAGE

Enclosed please find Amended Bill of Complaint and two Motions to be filed in captioned cases. Please send copies of same to Chason, Stone & Chason, Bay Minette, Ala.

SIGNED: *John V. Duck*

REPLY

DATE OF REPLY:

REPLY TO:

SIGNED:

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

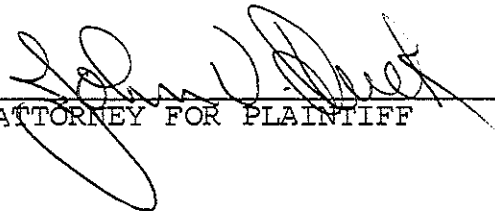
ROBERT LANGFORD	)	
	)	IN THE CIRCUIT COURT OF
PLAINTIFF	)	BALDWIN COUNTY, ALABAMA
VS.	)	
	)	AT LAW
WILLIAM DON HAMPTON, a Minor, and HARRY HAMPTON, jointly and individually,	)	
	)	
DEFENDANTS	)	

COUNT ONE

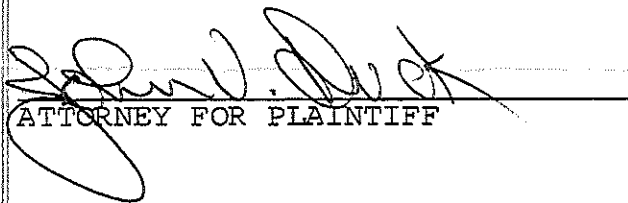
Plaintiff claims of the Defendants the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that, heretofore, and on, to-wit the 21st day of November, 1963, Plaintiff's wife was operating a motor vehicle upon and along Alabama Highway 104, traveling in a Westerly direction, approximately three miles West of Silverhill, Alabama, which said highway being then and there a public highway in Baldwin County, Alabama, and at said time and place, the Defendant, WILLIAM DON HAMPTON, as agent, servant or employee of the Defendant, HARRY HAMPTON, while acting within the line and scope of his authority, as agent, servant or employee, negligently ran a motor vehicle into, upon or against Plaintiff's said wife, and by reason thereof, and as the proximate result and consequence thereof Plaintiff's said wife received severe personal injuries in this, to-wit: She suffered serious injuries she sustained fractures of the ninth, tenth and eleventh ribs on the right; she suffered fractures of the first and second costo vertebral processes; she suffered anterior displacement of the liver, colon, and kidney on the right; and said Plaintiff's wife being pregnant at the time, subsequently suffered a miscarriage, and her infant child died; she hemorrhaged internally; she suffered multiple contusions and abrasions, she was caused to suffer great pain and anguish, and continues to suffer great pain and mental anguish, and she was permanently injured, all as a proximate cause of the negligence of the Defendants, as aforesaid.

Plaintiff further avers that due to the negligence of the Defendants, Plaintiff's wife was caused to lose time from her employment and will in the future continue to lose time from her employment.

Plaintiff further avers that as the proximate result and consequence of the injuries to his said wife, the Plaintiff was caused to incur great expense for medical, surgical and hospital treatment, the taking of X-rays, nurses attention, doctors, etc., in and about the treatment of Plaintiff's said wife, and will have to incur further expenses in the future, and Plaintiff lost and continues to lose the society, consortium and services of his said wife; for all of which he claims damage; that as a proximate result of the negligence of the Defendants as aforesaid, the Plaintiff's motor vehicle was rendered a total loss; for all of which he claims damages; hence this suit.

  
ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands a trial by jury.

  
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA  
BALDWIN COUNTY

No.....

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon WILLIAM DON HAMPTON

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....WILLIAM DON HAMPTON, a Minor & HARRY HAMPTON, jointly & individually, Defendant.....

by .....

.....ROBERT LANGFORD..... Plaintiff.....

Witness my hand this.....3..... day of.....June..... 1964.....

W. L. Lacey..... Clerk

EX-6-10-64

Duck & Lacey, Sol. for Plaintiff

No. 6240

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ROBERT LANGFORD

Plaintiffs

vs.

WILLIAM DON HAMPTON, a Minor

& HARRY HAMPTON, jointly &

individually

Defendants

SUMMONS AND COMPLAINT

Filed 6-3 1964

Clair J. Duck Clerk

Duck & Lacey, Fairhope, Ala.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
P.O. Box 67  
Loxley, Alabama

Received In Office

6/3 1964

....., Sheriff

I have executed this summons

this 10<sup>th</sup> of June 1964

by leaving a copy with

Harry Hampton  
William Don Hampton

Sheriff claims 50

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY T.W.  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Leed Subal Deputy Sheriff

Loxley

ROBERT LANGFORD,

Plaintiff,

vs.

WILLIAM DON HAMPTON, a  
Minor, and HARRY HAMPTON,  
jointly and individually,

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Come the Defendants in the above styled cause and demur to the complaint filed in said cause, and assign the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That said complaint does not contain the name of the injured party.
3. That said complaint does not properly charge agency.
4. That said complaint does not allege any duty owing by the Defendants to the Plaintiff.
5. That the allegation as to the loss of time by the Plaintiff's wife are not sufficient.
6. That any claim for loss of time by the Plaintiff's wife from her employment is not a proper element of damages.

*William Stone & Lawrence*  
 Attorneys for Defendants

**FILED**  
 JUL 2 1964  
 ALICE J. DICK, CLERK  
 REGISTER

6080

ROBERT LANGFORD,

Plaintiff,

vs.

WILLIAM DON HAMPTON, a  
Minor, and HARRY HAMPTON,  
jointly and individually,

Defendants.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

FILED

JUL 2 1906

ALICE J. DUNN, CLERK

ROBERT LANGFORD,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
WILLIAM DON HAMPTON, a Minor,)	)	6080
and HARRY HAMPTON, jointly	)	
and individually,	)	
Defendants.	)	

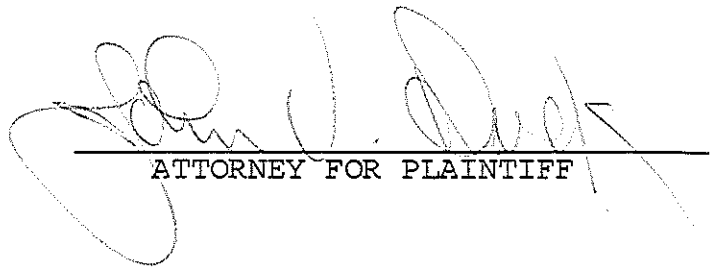
Comes now the Plaintiff in the above styled cause, and amends his Bill of Complaint filed heretofore, to read as follows:

COUNT ONE

Plaintiff claims of the Defendants, the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that, heretofore, and on, to-wit: the 21st day of November, 1963, Plaintiff's wife, VERNA MAE LANGFORD, was operating a motor vehicle upon and along Alabama Highway 104, traveling in a westerly direction, approximately three miles west of Silverhill, Alabama, which said highway was then and there a public highway in Baldwin County, Alabama, and at said time and place, the Defendant, WILLIAM DON HAMPTON, as agent, servant or employee of the Defendant, HARRY HAMPTON, while acting within the line and scope of his authority, as agent, servant or employee, so negligently operated a motor vehicle as to allow it to run into, upon or against the vehicle in which Plaintiff's said wife was riding, and as a proximate result of the Defendant's negligence as aforesaid, Plaintiff's said wife received severe personal injuries in this, to-wit: She suffered serious injuries, she sustained fractures of the ninth, tenth and eleventh ribs on the right; she suffered fractures of the first and second costo vertebral processes; she suffered anterior displacement of the liver, colon and kidney on the right; and said Plaintiff's wife being pregnant at the time, subsequently suffered a miscarriage, and her infant child died; she hemorrhaged internally; she suffered multiple contusions and abrasions, she was caused to suffer great pain and mental anguish, and continues to suffer great pain and mental anguish, and she was permanently injured, all as a proximate cause of the negligence of the Defendant as aforesaid.



Plaintiff avers that as the proximate result and consequence of the injuries to his said wife, the Plaintiff was caused to incur considerable expenses for medicine, surgical and hospital treatment, the taking of X-rays, nurses attention, doctors, in and about the treatment of his said wife, and will probably have to incur further expenses in the future, and the Plaintiff lost and continues to lose the society, consortium and services of his said wife; for all of which he claims damages; hence this suit.

  
ATTORNEY FOR PLAINTIFF

FILED

JAN 20 1935

WELLS

ROBERT LANGFORD,

Plaintiff,

vs.

WILLIAM DON HAMPTON, A Minor,  
and HARRY HAMPTON, Jointly  
and Individually,

Defendants.

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IN THE CIRCUIT COURT OF

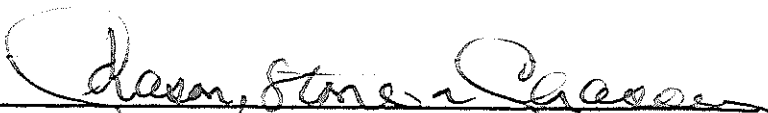
BALDWIN COUNTY, ALABAMA

LAW SIDE

DEMURRER

Come the Defendants in the above styled cause and demur to the amended complaint filed by the Plaintiff in said cause and assign the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That said complaint fails to allege whether the Plaintiff was driving the motor vehicle in which she was riding or whether she was a passenger.
3. That said complaint fails to allege when the Plaintiff's wife suffered a miscarriage and when her infant child died.
4. That said complaint does not allege in what manner the Plaintiff's wife is permanently injured.
5. That said complaint claims speculative damages.

  
Attorneys for Defendants

*Filed 2-4-65*

6080

ROBERT LANGFORD,  
Plaintiff,

vs

WILLIAM DON HAMPTON, A  
Minor, et al.,  
Defendants.

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DEMURRER

\*\*\*\*\*

FILED  
CLERK  
REGISTER

ROBERT LANGFORD,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
WILLIAM DON HAMPTON, a Minor,	)	6080
and HARRY HAMPTON, jointly	)	
and individually,	)	
Defendants.	)	

MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM

Comes now the Plaintiff in the above styled cause, and respectfully moves that the Court appoint a Guardian Ad Litem on behalf of WILLIAM DON HAMPTON, and for grounds thereof says:

That the said WILLIAM DON HAMPTON is a minor under the age of twenty-one (21) years.

*John J. Beck*  
 \_\_\_\_\_  
 Attorney for Plaintiff

FILED  
 JAN 20 1965  
 ALICE A. DAVIS, CLERK