

VERNA MAE LANGFORD,	)	IN THE CIRCUIT COURT OF
	)	
PLAINTIFF	)	BALDWIN COUNTY, ALABAMA
	)	
VS:	)	AT LAW
	)	
HARRY HAMPTON and WILLIAM DON	)	
HAMPTON, a Minor, jointly	)	
and individually	)	
	)	
DEFENDANT	)	

6081

COUNT ONE


Plaintiff claims of the Defendants the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS as damages, for that, heretofore, and on, to-wit, the 21st day of November, 1963, the Plaintiff was driving a motor vehicle on and along Alabama Highway 104, approximately three miles West of Silverhill, Alabama, traveling in a Westerly direction, 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, so negligently operated a motor vehicle at said time and place, as to allow it to run into, upon or against the said motor vehicle in which Plaintiff was riding, overturning the said motor vehicle that said Plaintiff was operating, and as a proximate result of the negligence of 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 such, the Plaintiff was injured in this: She suffered serious injuries in that 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 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 she was caused to lose time from her employment and will in the future continue to lose time from her employment.


#### COUNT TWO

Plaintiff claims of the Defendants the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS as damages, for that, heretofore, and on, to-wit, the 21st day of November, 1963, the Plaintiff was driving a motor vehicle on and along Alabama Highway 104, traveling in a Westerly direction, approximately three miles West of Silverhill, Alabama, 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, willfully or wantonly operated a motor vehicle on or along said highway as to allow it to run into, upon or against the said motor vehicle in which Plaintiff was riding, overturning the said motor vehicle that Plaintiff was operating, and as a proximate result of the willful and wanton negligence of 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 such, Plaintiff was willfully and wantonly injured by said Defendants, in that: She suffered serious injuries in that 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 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 she was caused to lose time from her employment and will in the future continue to lose time from her employment; HENCE, Plaintiff sues.

  
\_\_\_\_\_  
ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands 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 Commanded 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..... HARRY HAMPTON  
and WILLIAM DON HAMPTON, a Minor, jointly and individually Defendant.....

by .....

..... VERNA MAE LANGFORD Plaintiff.....

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

..... Bevinger Clerk

EX-6-10-64  
Duck & Lacey, Sol. for Plaintiff

No. 6081 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

VERNA MAE LANGFORD

Plaintiffs

vs.

HARRY HAMPTON &

WILLIAM DON HAMPTON,

et cet

Loxley

Defendants

SUMMONS AND COMPLAINT

Filed 6-3 1964

Rebecca J. Smith 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's Office 80 miles at

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS Sheriff

BY Taylor Wilkins DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred Smith Deputy Sheriff

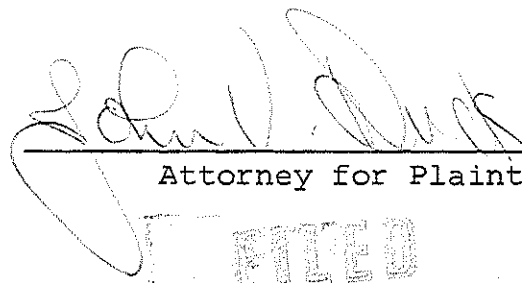
Loxley

VERNA MAE LANGFORD,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
WILLIAM DON HAMPTON, a Minor,)		2081
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.

  
 Attorney for Plaintiff

**FILED**  
 JAN 20 1965  
 JOHN L. DUCK, CLERK  
 REGISTER

VERNA MAE LANGFORD,

Plaintiff,

vs.

HARRY HAMPTON and WILLIAM  
DON HAMPTON, a Minor, 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 each and every count thereof separately and severally 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 allege any duty owing by the Defendants to the Plaintiff.
3. That said complaint is vague and indefinite.
4. That said complaint does not allege that the Plaintiff was gainfully employed at the time of the accident.
5. That said complaint does not allege how much time the Plaintiff has lost from her employment.
6. That "COUNT TWO" of said complaint does not allege that the Defendants willfully or wantonly injured the Plaintiff.
7. That said complaint does not properly allege agency.

*Vernon Stone & Gerson*  
Attorneys for Defendants

FILED

JUL 2 1964

ALICE L. DUCK, CLERK  
REGISTERED

6081

VERNA MAE LANGFORD,

Plaintiff,

vs.

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

Defendants.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

FILED

JUL 2 1904

ALICE J. DICK, CLERK  
REGISTER



VERNA MAE LANGFORD,

Plaintiff,

vs.

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

Defendant

Y

Y

Y

Y

Y

Y

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

No. 6081

Comes the Defendant, William Don Hampton, and amends  
his pleas heretofore filed in said cause by adding plea four  
which shall read as follows:

4. The Defendant, William Don Hampton, claims of the  
Plaintiff, by way of recoupment, the sum of Two Thousand Five  
Hundred Dollars (\$2,500.00) as damages for that on, to-wit,  
November 21, 1963, the Plaintiff was driving a motor vehicle on  
Alabama Highway 104 approximately three miles West of Silverhill,  
Alabama, in Baldwin County, Alabama, and at said time and place  
the Plaintiff negligently drove such motor vehicle into or  
against an automobile driven by such defendant and as a proximate  
result of the negligence of the Plaintiff the Defendant, William  
Don Hampton, was injured in this: His mouth was cut, his upper  
teeth were cracked and loosened; he suffered severe pain and was  
caused to incur medical expenses, all to the damage of the  
Defendant, William Don Hampton, in the sum above mentioned.

*Chason, Stone & Chason*  
Attorneys for Defendant

FILED  
FEB 23 1965  
ALICE I. DICK, CLERK  
REGISTER

VERNA MAE LANGFORD,

Plaintiff,

vs.

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

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

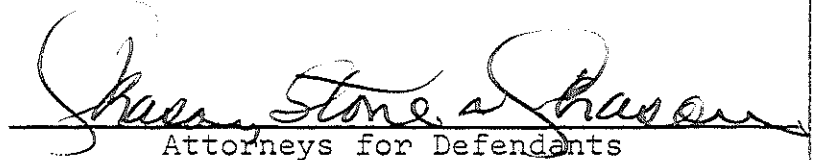
LAW SIDE

PLEAS

Come the Defendants in the above styled cause and for plea to the Complaint filed in said cause and each and every count thereof, separately and severally, and say:

1. Not guilty.

2. The Defendants allege that the Plaintiff, at the time and place complained of in the Complaint was guilty of negligence which was the proximate cause of her injuries and damages, hence she can not recover in this suit.

  
Attorneys for Defendants

FILED  
FEB 5 1963  
CLERK OF COURT  
BALDWIN COUNTY, ALABAMA

0081

VERNA MAE LANGFORD,  
Plaintiff,

VS

HARRY HAMPTON, ET AL.,  
Defendants.

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PLEAS

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FILED  
JUN 1 1966  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VERNA MAE LANGFORD,

Plaintiff,

vs.

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

Defendant

Y

Y

Y

Y

Y

Y

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

No. 6081

Comes the Defendant, Harry Hampton, and amends his pleas heretofore filed in said cause by adding plea three which shall read as follows:

3. The Defendant, Harry Hampton, claims of the Plaintiff, by way of recoupment, the sum of One Thousand Dollars (\$1,000.00) as damages for that on, to-wit, November 21, 1963, the Plaintiff was driving a motor vehicle on Alabama Highway 104 approximately three miles West of Silverhill, Alabama, in Baldwin County, Alabama, and at said time and place the Plaintiff negligently drove such motor vehicle into or against an automobile owned by the Defendant and as a proximate result of the negligence of the Plaintiff the automobile owned by the Defendant Harry Hampton was damaged in this: Its radiator, hood, front fenders, lights, front bumper and grill were completely demolished; its windshield was broken and it was practically completely destroyed, all to the damage of the Defendant Harry Hampton in the sum above mentioned.

FILED

FEB 23 1965

ALICE L. DUCK, CLERK  
REGISTER

*James Stone, Jr. & D. L. Bussan*  
Attorneys for Defendant