

HOWARD PAGE, a minor, by
his next friend and father,
CHARLES B. PAGE,

Plaintiff,

vs.

NETTIE P. ROBBINS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

7206294

BILL OF COMPLAINT

The Plaintiff claims of the Defendant the sum of One Thousand Four Hundred Ninety-nine and no/100 Dollars (\$1,499.00) for that heretofore on, to-wit, June 16, 1964, the Plaintiff was operating a motor scooter on North Main Street in Atmore, Alabama, a public road in the City of Atmore, Alabama, at a point thereon in front of the Good Will Manufacturing Company, and at the same time and at the same place, the Defendant, Nettie P. Robbins, so negligently operated her motor vehicle so as to cause or allow the same to run into, upon or against the motor scooter that the Plaintiff was then and there riding so that the Plaintiff received a broken leg, cuts and bruises, and was made to become sore and stiff, and that the motor scooter which he owned was bent, broken and torn and said injuries and damages to the Plaintiff and to the motor scooter of the Plaintiff were the proximate consequences of the Defendant aforesaid, hence this suit.

John H. Maxwell

Attorney for Plaintiff.

FILED

NOV 9 1964

ALICE L. DICK, CLERK
REGISTER

*I, Hannon Owens, Jr. Attorney for
Defendant, Nettie P. Robbins, hereby
accept service of Bill of Complaint.
Hannon Owens, Jr.*

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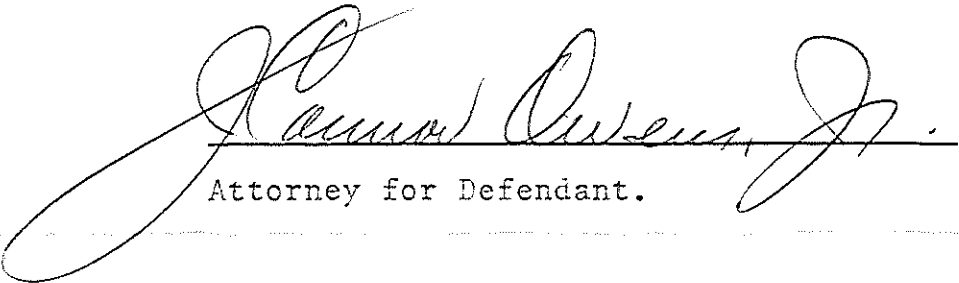
LAW SIDE.

no. 6294

ANSWER:

Comes the Defendant, Nettie P. Robbins, and for answer to
the Bill of Complaint filed in said cause, says:

1. That she is not guilty of the matters alleged therein.


Attorney for Defendant.

FILED

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ALICE J. DICK, CLERK
REGISTER