

ROGER DALE NEWBURN, A Minor
by Wanda Ivalene Newburn
As his next friend,

Plaintiff,

vs.

JAMES E. CARTER and
BROWN & ROOT, INC.,
A corporation,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

6312

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Five Hundred Dollars (\$500.00) as damages for that on, to-wit: the 28th day of November, 1963 at the intersection of Baldwin County Route 27 and Baldwin County Route 48 otherwise known as the Klumpp Airport Intersection in Baldwin County, Alabama, the Defendant, James E. Carter, who was then and there the agent, servant or employee of the Defendant Brown & Root, Inc. and who was then and there acting within the line and scope of his employment as such agent, servant or employee did so negligently operate an automobile as to cause or allow the same to run into or against the motor vehicle in which the Plaintiff was riding and as a proximate result of the negligence of the Defendant aforesaid the Plaintiff was injured in that he sustained a fracture of his right pelvis; a laceration of his lip and a concussion all to the damages of the Plaintiff in the sum above mentioned, hence this suit.

By: Kenneth Cooper
Attorney for Plaintiff

FILED

NOV 29 1964

ALICE L. DICK, CLERK
REGISTRY

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FILED

NOV 20 1964

Alice J. Owen, CLERK
REGISTER

By: Kenneth Cooper
Attorney for Plaintiff

ROGER DALE NEWBURN, A Minor,
suing by Wanda Ivalene Newburn
As his next friend,

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AT LAW

PLEA

Come the Defendants in the above styled cause, by their attorneys, and for answer to the complaint heretofore filed against them in said cause, pleads, separately and severally, as follows:

1. Not guilty.

FILED

NOV 20 1964

ALICE L. DUCK, CLERK
REGISTER

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Defendants