

LINDA GAYLE TOLBERT, A Minor Suing \*  
By and through her father and next \*  
friend, JAMES TOLBERT

Plaintiff

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

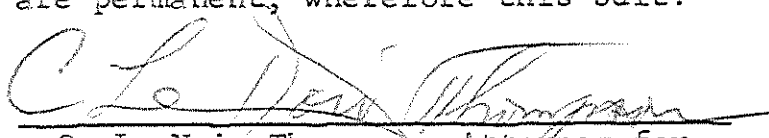
vs.

RUSSELL M. CRAWFORD and TOMMY CRAWFORD,\*  
Jointly and severally,

Defendants

CASE NO. \_\_\_\_\_

Plaintiff claims of the defendants the sum of TEN THOUSAND DOLLARS damages for that heretofore and on, to-wit, February 19, 1965, the Defendant Tommy Crawford, while acting as the agent, servant, or employee of the Defendant Russell M. Crawford, and while acting within the line and scope of his employment as such agent, did so negligently operate the vehicle he was driving on Brady Road at or near its intersection with Abernathy Avenue, both of said streets being public streets in the County of Baldwin, State of Alabama, as to cause or allow the said vehicle to run into, upon and against the vehicle in which the plaintiff was riding at the said time and the said place, and as a direct and proximate result of the defendant's negligence as aforesaid, the plaintiff was injured and damaged in this: She was made sick, sore and lame she received multiple bruises, contusions, and abrasions; she received a laceration across the lower portion of her nose at the nostril; she received a laceration of the entire upper lip; she received a laceration of the left knee; she received lacerations on her left leg; she received a bruised chest; she received a laceration of her forehead; she suffered scars about her face and legs; she has suffered and will continue to suffer physical pain and mental anguish; she has been hospitalized and will be hospitalized in the future the plaintiff alleges that the above described injuries are permanent, wherefore this suit.

  
C. Le Noir Thompson, Attorney for  
Plaintiff

Defendant Russell Crawford may be served at 407 East 5th Street,  
Bay Minette, Alabama --- Tommy Crawford may be served at the above address.

Service accepted on behalf of defendants Oct. 1, 1965.

W. J. Horsley

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Plaintiff

vs.

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Jointly and Severally,

Defendants

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

CASE NO. \_\_\_\_\_

Comes now Russell M. Crawford, a defendant in the above styled  
cause, and Tommy Crawford, a minor, by and through W. F. Horsley as  
his guardian ad litem, and for answer to the plaintiff's complaint,  
say as follows:

1. The material allegations are untrue.
2. Not guilty.

LYONS, PIPES, & COOK  
Attorneys for the Defendants

FILED

OCT 1, 1965

ALICE L. DUCK, CLERK  
REGISTER

BY:

W. F. Horsley  
W. F. Horsley

W. F. Horsley  
W. F. Horsley as Guardian ad litem  
for Tommy Crawford.

I, C. Le Des Thompson, attorney for  
Plaintiff accept service on this Oct 1, 1965

THE STATE OF ALABAMA }  
Baldwin }  
COUNTY }

## PROBATE COURT

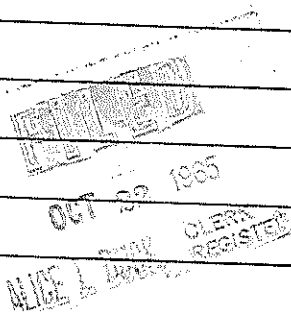
LETTERS OF GUARDIANSHIP OVER THE ESTATE OF  
Linda Gayle Tolbert, Minor

are hereby granted to James B. Tolbert, who has duly  
qualified and given bond as required by law, and is authorized to discharge all the functions attached to  
said guardianship.

Dated this 21st day of October, A.D. 1965

Code 1940—Tit. 21, Sec. 1.

215 /s/ Harry D'olive, Judge of Probate



THE STATE OF ALABAMA }  
Baldwin COUNTY }

I, Harry D'olive, Judge of Probate in and for said  
County and State, hereby certify that the within and foregoing is a true, correct and complete copy of the  
Letters of Guardianship issued to James B. Tolbert  
as Guardian of the estate of Linda Gayle Tolbert  
as same appears of record in my office and same are in full force and effect.

Given under my hand and seal of office, this the 21st day of October, 1965.

Harry D'olive  
Judge of Probate

No. \_\_\_\_\_

THE STATE OF ALABAMA

COUNTY

PROBATE COURT

ESTATE OF

LETTERS OF GUARDIANSHIP TO

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