

GLEND A P. TOLBERT, a Minor Suing
By and through her father and next
friend, DAVID EUGENE TOLBERT,

Plaintiff

vs

RUSSELL M. CRAWFORD AND TOMMY CRAWFORD,
Jointly and Severally,

Defendants

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW

) CASE NO

6477

Come now Russell M. Crawford, individually, and Tommy Crawford,
a Minor, by and through his father and next friend, Russell M. Crawford,
and accept service of the plaintiff's complaint, and for answer to the
plaintiff's complaint, say as follows:

1. They deny the material allegations.
2. That they are not guilty.

LYONS, PIPES AND COOK
ATTORNEYS FOR DEFENDANTS

By

Walter M. Cook
Walter M. Cook

FILED
APR 21 1967
ALICE J. DICK, CLERK
REGISTER

GLEND A P. TOLBERT, a minor
suing by and through her
father and next friend,
DAVID EUGENE TOLBERT,

Plaintiff,

VS.

RUSSELL M. CRAWFORD and
TOMMY CRAWFORD, jointly
and severally,

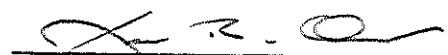
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

MOTION TO APPOINT GUARDIAN AD LITEM

Now comes the plaintiff and shows unto the court that the
defendant, Tommy Crawford, is a minor and that a guardian ad litem
should be appointed to defend him in this cause.

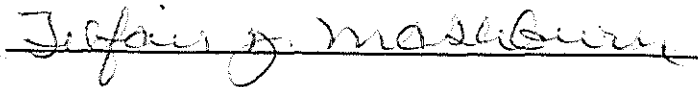

Attorney for Plaintiff

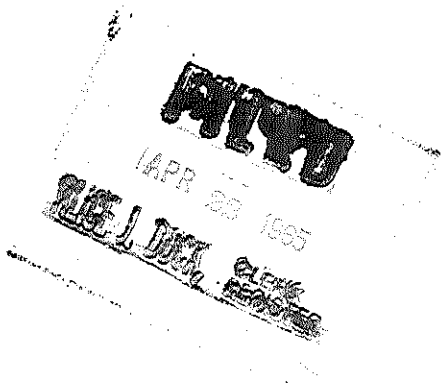
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ORDER APPOINTING GUARDIAN AD LITEM

In this cause it appearing to the court that the defendant,
Tommy Crawford, is a minor and should have a guardian ad litem
appointed to represent him in this cause, it is, therefore, ordered
by the court that W. F. Horsley, Attorney at Law, be and he hereby
is appointed as guardian ad litem to represent the defendant, Tommy
Crawford, in this cause.

ORDERED this 21st day of April, 1965.





GLEND A P. TOLBERT, a minor
suing by and through her
father and next friend,
DAVID EUGENE TOLBERT,

Plaintiff,

-VS-

RUSSELL M. CRAWFORD and
TOMMY CRAWFORD, jointly
and severally,

Defendants.

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW

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CASE NO. 10477

Plaintiff claims of the defendant the sum of TWO THOUSAND & no/100 (\$2,000.00) DOLLARS damages for that heretofore and on, to-wit, February 19, 1965, the defendant so negligently operated 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 said time and said place, and as a direct and proximate result of the defendant's negligence as aforesaid, the plaintiff was damaged in this: He received abrasions about his nose and upper lip, contusions to his chest, abrasions around and upon his abdomen, contusions to his ribs, multiple lacerations and contusions on his face and legs; and plaintiff alleges that the above described injuries are permanent, wherefore this suit.

JAMES R. OWEN
Attorney for the Plaintiff



Defendant Russell Crawford
may be served at 407 E. 5th Street,
Bay Minette, Alabama

Defendant Tommy Crawford may be
served at 407 E. 5th Street,
Bay Minette, Alabama

Service accepted by
W. P. Hordley as
Attorney for Defendants
4-21-65

FILED

APR 21 1965

ALICE L. JAMES, CLERK
COURT CLERK