

6504

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Redus M. Akers to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Yolanda Harvill, a minor, suing by and through James E. Harvill, as her father and next friend.

Witness my hand this 6 day of May, 1965.

Archie Harvill
Clerk

YOLANDA HARVILL, a minor, suing by and through JAMES E. HARVILL, as her father and next friend,	X	
	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	X	LAW SIDE
REDUS M. AKERS,	X	
Defendant.	X	

COUNT 1:

The Plaintiff claims of the Defendant the sum of Five Thousand Dollars (\$5,000.00) as damages for that on, to-wit: November 22, 1964, at the intersection of Hand Avenue and 5th Street in Bay Minette, Baldwin County, Alabama, Hand Avenue being also known as Highway No. 59, the Defendant negligently drove an automobile into or against the automobile in which the Plaintiff was riding and as a proximate result of the negligence of such Defendant the Plaintiff was injured in this: some of her teeth were loosened causing severe pain and permanent injury to such

teeth; she received a severe blow on her upper lip which has caused a knot to form; she received multiple bruises and abrasions; she was caused to incur medical expenses and will continue to have medical expenses in the future, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

Garson, Stone & Garson
Attorneys for Plaintiff

Plaintiff demands a trial
of this cause by a jury.

Garson, Stone & Garson
Attorney for Plaintiff

64-5-10-65

FILED

Alice J. Duck, CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

FILED
CLERK
REGISTER

SUMMONS AND COMPLAINT

YOLANDA HARVILL,
a minor,
Plaintiff,
-vs-
REDUS M. AKERS,
Defendant.

TAYLOR WILKINS, Sheriff
By *W. A. Taylor*
D.S.

Received *May 19 1965* day of *May* 1965
and on *10* day of *May* 1965
I served a copy of the within
on *Redus M. Akers*
By service on _____

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 6504

PLEA

Now comes the defendant, by his attorneys, and for plea to the complaint and to each and every count thereof, separately and severally, says:

1. Not guilty.

J. B. BLACKBURN
JAMES R. OWEN
Attorneys for Defendant

By

1 2 3 4 5

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LEE L. DUCK, CLERK
REGISTERED