

JOHN MALCOLM DAVIS, a minor
suing by and through JOHN Z.
DAVIS, as his Father and next
friend,

Plaintiff,

vs.

MARVIN E. KELLY,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

PLEA

Comes the Defendant in the above styled cause and for
plea to the Complaint filed in said cause says:

1. Not guilty.

FILED

NOV 23 1965

ALICE L. DUCK, CLERK
REGISTER

Marvin E. Kelly
Defendant

JOHN MALCOLM DAVIS

Plaintiff,

vs.

MARVIN E. KELLY,

Defendant.

STATE OF ALABAMA

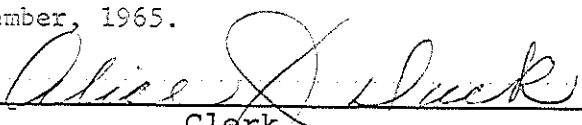
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Marvin E. Kelly 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 John Malcolm Davis a minor suing by and through John Z. Davis, as his father and next friend.

Dated this 29th day of November, 1965.


Clerk

JOHN MALCOLM DAVIS, a minor	X	
suing by and through JOHN Z.		
DAVIS, as his Father and next	X	IN THE CIRCUIT COURT OF
friend,		
	X	BALDWIN COUNTY, ALABAMA
Plaintiff,		
	X	LAW SIDE
vs.		
	X	6770
MARVIN E. KELLY,		
	X	
Defendant.		
	X	

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) as damages for that on, to-wit, August 22, 1965, at the intersection of Rabun Road and Interstate Highway 65 about six miles North of Bay Minette in Baldwin County, Alabama, the Defendant wantonly injured the said John Malcolm Davis by wantonly driving an automobile in which the said John Malcolm Davis was riding as a guest at a reckless rate of speed and as a proximate result of the wanton negligence of the Defendant the

said John Malcolm Davis was injured in this: his chin was lacerated and two of his teeth were loosened so that they had to be extracted and he was otherwise bruised and lacerated, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

Green, Stone & Hana
Attorneys for Plaintiff

FILED
NOV 29 1965
ALICE L. DICK, CLERK
REGISTER

JOHN MALCOLM DAVIS, a minor,
suing by and through JOHN Z.
DAVIS, as his Father and next
friend,

Plaintiff,

vs.

MARVIN E. KELLY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

SUMMONS AND COMPLAINT
