

EDWIN A. SHELDON, as Father )  
and next Friend of THERESA )  
LYNN SHELDON, a Minor, )

Plaintiff, )

-vs- )

ALFORD MOSLEY and CLAUDE )  
JUNIOR MIMS, jointly and )  
individually, )

Defendants. )

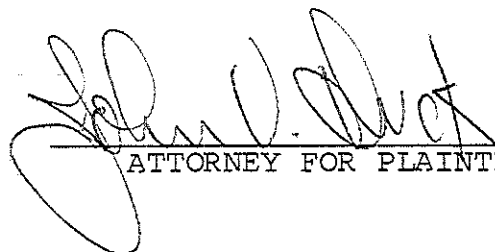
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

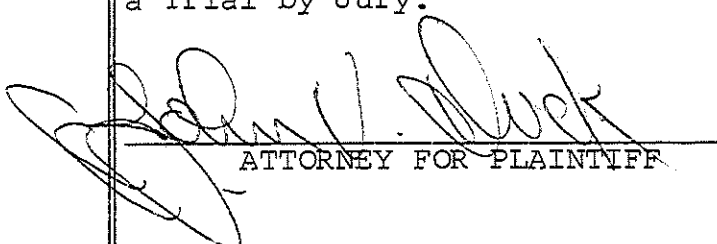
6515

The Plaintiff, THERESA LYNN SHELDON, a minor, suing by her Father and next Friend, EDWIN A. SHELDON, claims of the Defendants, TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS as damages for that, on, to-wit: the 19th day of January, 1965, in the Town of Robertsedale, County of Baldwin, Alabama, the Plaintiff was riding in an automobile on Milwaukee Street, at its intersection with Spaceway Shopping Center, which was then and there a public highway in Baldwin County, Alabama, the Defendant, CLAUDE JUNIOR MIMS, the agent, servant or employee of the Defendant, ALFORD MOSELY, so negligently operated a motor vehicle as to allow it to run into, upon or against the automobile in which Plaintiff was riding, and as a proximate result of the negligence as aforesaid, the Plaintiff received severe personal injuries in this, to-wit: she suffered a complete fracture of her mandible just to the right of the midline. She suffered multiple contusions and abrasions, she suffered and continues to suffer a mental and physical pain; she was hospitalized and confined to her bed and remained there for several days, all as a result of the negligence aforesaid, hence this suit.

FILED  
JAN 14 1965  
ALFRED L. DICK, CLERK  
REGISTER

  
ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands  
a Trial by Jury.

  
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA  
BALDWIN COUNTY

No. 515

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ALFORD MOSLEY and CLAUDE JUNIOR MIMS,  
jointly and individually,

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed  
in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

ALFORD MOSLEY and CLAUDE JUNIOR MIMS, jointly and individually,  
.....Defendant..S.

by EDWIN A. SHELDON, as Father and next Friend of THERESA LYNN  
SHELDON, a Minor, Plaintiff.....

Witness my hand this 14 day of May 1965

EX-5-28-65

Arthur French Clerk

No. 4575

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

EDWIN A. SHELDON, as Father

and next Friend of THERESA LYNN  
SHELDON, a Minor Plaintiffs

vs.

ALFORD MOSLEY and CLAUDE JUNIOR

MIMS, jointly and individually.

Defendants

SUMMONS AND COMPLAINT

Filed 5-14 1965

Reice J. Duck Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Both Defendants live in  
Loxley, Alabama.

RECEIVED  
Received in Office

MAY 14 1965 19.....

TAYLOR WILKINS Sheriff

I have executed this summons

this 28 May 1965

by leaving a copy with

Alford Mosley  
Claude Junior Mims

Sheriff claims 100 miles at

Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff

BY Chelden  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

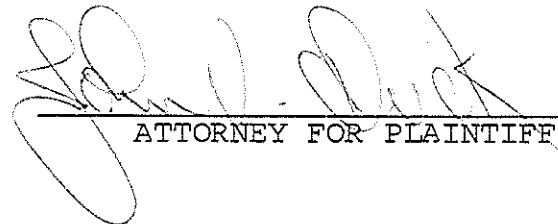
Chelden Deputy Sheriff

Phelan

THERESA LYNN SHELTON, a Minor,	)	IN THE CIRCUIT COURT OF
suing by and through her Father	)	BALDWIN COUNTY, ALABAMA
and next Friend, EDWIN A. SHELTON,	)	
Plaintiff,	)	AT LAW
	)	4575
vs.	)	
ALFORD MOSLEY and CLAUDE JUNIOR MIMS,	)	
jointly and individually,	)	
Defendants.	)	

Comes now the Plaintiff in the above styled cause,  
and amends the Bill of Complaint filed herein to read as follows:

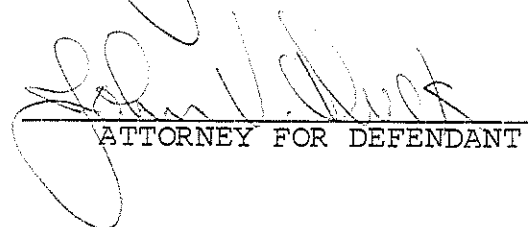
THERESA LYNN SHELTON, a Minor, suing by and  
through her Father and next Friend, EDWIN A. SHELTON.

  
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel  
for the opposing party in the foregoing matter with a copy of this  
pleading by depositing in the United States Mail a copy of same in  
a properly addressed envelope with adequate postage thereon.

This 21<sup>st</sup> day of August, 1965

  
ATTORNEY FOR DEFENDANT

FILED

AUG 24 1965

ALICE J. DUCK, CLERK  
REGISTER

<p>THERESA LYNN SHELDON, a  Minor, suing by and through her  Father and next Friend, EDWIN  A. SHELDON,</p> <p>Plaintiff,</p> <p>vs.</p> <p>ALFORD MOSLEY and CLAUDE  JUNIOR MIMS, jointly and individ-  ually,</p> <p>Defendants.</p>	<p>)</p> <p>(</p> <p>*</p> <p>*</p> <p>)</p> <p>(</p> <p>*</p> <p>*</p> <p>)</p> <p>(</p>	<p>IN THE CIRCUIT COURT OF</p> <p>BALDWIN COUNTY, ALABAMA</p> <p>AT LAW</p> <p>NO. _____</p>
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P L E A

Comes now the Defendants and for answer to the Complaint and to each and every count thereof, separately and severally, files the following separate and several pleas:

1. Not guilty.

ARMBRECHT, JACKSON & DeMOUY

By: \_\_\_\_\_

BROOX G. HOLMES

**FILED**

SEP 9 1965

JOHN V. DUCK, CLERK  
REGISTER

CERTIFICATE OF SERVICE

I, BROOX G. HOLMES, do hereby certify that I have served a copy of the foregoing Plea on John V. Duck, Esq., Attorney for Plaintiff, by mailing the same to him by United States mail, properly addressed and first class postage prepaid, on this 12 day of September, 1965.

  
BROOX G. HOLMES

DUCK & LACEY  
Attorneys at Law  
P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

P. O. Box 239

Bay Minette, Ala.

DATE May 13, 1965

Re: EDWIN A. SHELDON & THERESA LYNN SHELDON,

a Minor, vs. MOSLEY & MIMS 7/15/65

Dear Mrs. Duck:

Enclosed you will find a Bill of Complaint  
to be filed in above case, together with  
copies of same and Summons to be served.

Sincerely,

SIGNED

*John V. Duck (L)*

DATE

SIGNED

SPEED LETTER

DUCK & LACEY  
Attorneys at Law  
P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

DATE August 21, 1965

Re: Sheldon vs. Mosley & Mims

Dear Mrs. Duck:

Enclosed is Amended Bill of Complaint  
to be filed in captioned cause.

Sincerely,

*John V. Duck*

SIGNED

SIGNED