

PATRICK V. WARREN, a minor who	*	IN THE CIRCUIT COURT OF
sues by and through his father	*	BALDWIN COUNTY, ALABAMA
and next friend, E. V. WARREN,	*	
	*	AT LAW
Plaintiff	*	
vs.	*	
RICHARD CLIFTON REYNOLDS,	*	
	*	CASE NO: <u>6985</u>
Defendant	*	


COUNT ONE

Plaintiff claims of the defendant the sum of FIFTEEN HUNDRED AND NO/100 (\$1500.00) DOLLARS damages for that here-
tofore and on to-wit April 3, 1966, the plaintiff was a
passenger in a motor vehicle being operated in a westwardly
direction on Alabama State Highway #292 at a point approximately
fifteen (15) miles East of Gulf Shores, Alabama, at which
point said Alabama State Highway #292 is a public road in
Baldwin County, Alabama, and at the said time and said place
the defendant so negligently operated the vehicle he was
driving as to cause or allow it to collide with the vehicle
in which the plaintiff was riding as a passenger, and as a
proximate result of the negligence of the defendant, as
aforesaid, the plaintiff was injured and damaged in this: He
was made sick, sore, and lame; he suffered multiple contusions
and abrasions over the whole of his body; he suffered severe
lacerations about his face, nose and eyes; he suffered an injury
to his cervical spine; he suffered physical pain and mental
anguish, and will continue to suffer physical pain and mental
anguish in the future; and plaintiff avers that all the above
described injuries are permanent, WHEREFORE this suit.

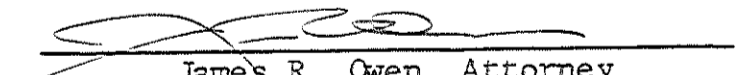
COUNT TWO

Plaintiff claims of the defendant the sum of FIFTEEN HUNDRED AND NO/100 (\$1500.00) DOLLARS damages for that here-

tofore and on to-wit April 3, 1966, while the plaintiff was riding as a passenger in a motor vehicle driven westwardly on Alabama State Highway #292 at a point approximately fifteen (15) miles East of Gulf Shores, Alabama, at which point said Alabama State Highway #292 is a public road in Baldwin County, Alabama, the defendant, at said time and said place, wantonly injured the plaintiff by wantonly operating the motor vehicle he was driving as to cause or allow it to collide with the motor vehicle in which plaintiff was riding as a passenger, and as a proximate consequence of the aforesaid wanton act of the defendant the plaintiff was wantonly injured in this: He was made sick, sore and lame; he suffered multiple contusions and abrasions over the whole of his body; he suffered severe lacerations about is face, nose and eyes; he suffered a injury to his cervical spine; he suffered physical pain and mental anguish, and will continue to suffer physical pain and mental anguish in the future; and plaintiff avers that all the above described injuries are permanent, WHEREFORE this suit.


James R. Owen, Attorney
for Plaintiff

Plaintiff demands trial by jury.


James R. Owen, Attorney
for Plaintiff

*Service accepted on behalf
of defendant by W.F. Horsley
as his attorney this
26 day of May 1966.*

W.F. Horsley

FILED
MAY 26 1966
ALICE L. BARK, CLERK
REGISTER

PATRICK V. WARREN, a minor who
sues by and through his father
and next friend, E. V. WARREN,

Plaintiff

vs.

RICHARD CLIFTON REYNOLDS,

Defendant

*

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*

*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: _____

Comes Now the Defendant, Patrick V. Warren, through
his attorney, Walter M. Cook, and accepts service of the
plaintiff's complaint and for answer to the plaintiff's
complaint says as follows:

1. Not Guilty.

FILED

MAY 23 1966

ALICE L. DICK, CLERK
REGISTERED

LYONS, PIPES & COOK
Attorneys for Defendant

BY:

Walter M. Cook
Walter M. Cook