

VERNELL STRICKLAND, a minor, : IN THE CIRCUIT COURT OF  
suing by and through his :  
grandfather and next friend, : BALDWIN COUNTY,  
James Cloy, :

Plaintiff : ALABAMA

v. :

M & S MUSIC COMPANY, INC., a : AT LAW  
corporation, and RICHARD C. :  
MAYO, jointly and separately, :

Defendants. : CASE NUMBER \_\_\_\_\_

A N S W E R

Comes now the defendants, separately and severally,  
and for answer to the plaintiff's complaint sets down  
and assigns the following separate and several pleas:

1. Not guilty.
2. The material allegations of the complaint are untrue.

Harry A. McDowell  
Attorney for Defendants

Service accepted this the  
4 day of August, 1966.

James Owens, Jr.  
Attorney for Plaintiff

FILED  
AUG 9 1966  
ALICE J. BUCK, CLERK  
REGISTER

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suing by and through his :  
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MAYO, jointly and separately: AT LAW

Defendants. : CASE NUMBER 7102

### C O M P L A I N T

Plaintiff claims of the defendants NINE HUNDRED AND NO/100 (\$900.00) DOLLARS, as damages, for that, on, to-wit, May 24, 1966, the defendant Richard C. Mayo, an agent, servant or employee of the defendant M & S Music Company, Inc., a corporation, while acting within the line and scope of such agency, service or employment, so negligently operated a motor vehicle on and along Alabama Highway 59, a public road in Baldwin County, Alabama, approximately 1.7 miles south of Stapleton, Alabama, at the intersection of the Steelwood Quarters Road, so as to cause or allow said motor vehicle to collide with the plaintiff who was then and there a pedestrian crossing Alabama Highway 59, and as a direct and proximate consequence of the defendant's negligence as aforesaid, plaintiff was injured in that his body was bruised, he suffered cuts and abrasions, he was caused to suffer a concussion, he suffered physical pain and mental anguish and will so suffer in the future, he was hospitalized

and permanently injured, all for which plaintiff sues.

J. Cannon Owens, Jr.  
Attorney for Plaintiff

Service accepted this the

25<sup>th</sup> day of July, 1966.

James A. McDowell  
Attorney for Defendants

FILED  
AUG 4 1966  
ALAN J. DICK, CLERK  
REGISTERED