

LARRY WAYNE BOBO, a Minor,)	IN THE CIRCUIT COURT OF
who sues by his father and next	(
friend, E. D. BOBO,	*	BALDWIN COUNTY, ALABAMA
	*	
Plaintiff,)	
	(
vs.	*	AT LAW
)	
WILLIAM CHARLES WILLETT,	(
	*	
Defendant.	*	CASE NO. <u>7234</u>

COMPLAINT

COUNT ONE

Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND 00/100 DOLLARS (\$750.00), damages, for that heretofore and on, to-wit: The 30th day of June, 1966, the Plaintiff was a passenger for hire and not a guest in an automobile driven by the Defendant, WILLIAM CHARLES WILLETT, and on said date, the Defendant so negligently operated the said automobile on Highway No. 27 (sometimes known as Bel Forest Road), a public highway in Baldwin County, Alabama, at a point approximately one mile north of Klump Airport near Fairhope, Alabama, as to cause or allow the wheel to come off of said automobile and the automobile to run off of the said highway. And as a proximate result of the negligence of the Defendant, as aforesaid, the Plaintiff was injured and damaged as follows, to-wit: His body was bruised, cut and broken; he was made sick, sore and lame; he was caused to suffer physical and mental pain and anguish, still so suffers and will so suffer in the future; he was permanently injured and disabled; he sustained severe myofascial and ligamentous strain of the neck, temporary hearing loss, headaches, nausea and blurred vision; hence, this suit.

FILED
JUN 31 1966
ALICE I. DUCK, CLERK
REGISTER


JOHN V. DUCK, Attorney for Plaintiff

ARMBRECHT ACKS N & DEMOUY
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MERCHANT ONE BUILDING

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MOB E. A. HAMA

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FRANK FRI

October 28, 1966

John V. Duck, Esquire
Attorney at Law
Fairhope, Alabama

No. 7234

Re: Larry Wayne Bobo, a Minor, etc.
v. William Charles Willett

Dear John:

Enclosed you will find two Fidelity and Casualty Company checks, one for \$3,177.79 payable to Mr. & Mrs. E. D. Bobo in full settlement of their claim, and a second check payable to Mrs. Duck in payment of the judgment to be entered in Larry's case.

I also enclose Larry's complaint, a motion to appoint me Guardian ad Litem since the Defendant is a minor, and the Defendant's answer. Please file these, have the judgment entered, paid and marked satisfied. Then have the cost bill mailed to me. Also, I enclose a release for Mr. and Mrs. Bobo to sign; please return the original and three executed copies to me.

Sincerely,

10-29-66

Dear Mrs. Duck:

Please file and send check to Probate.



Broox G. Holmes

BGH:ba
Encls.

LARRY WAYNE BOBO, a Minor,
who sues by his father and next
friend, E. D. BOBO,

Plaintiff,

vs.

WILLIAM CHARLES WILLETT,

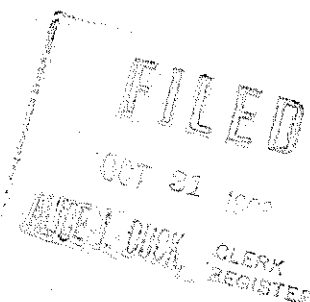
Defendant.

) IN THE CIRCUIT COURT OF
(
* BALDWIN COUNTY, ALABAMA
*
)
(
* AT LAW
)
(
*
* CASE NO. _____

MOTION

Comes now the Plaintiff and respectfully moves the Court to appoint
BROOX G. HOLMES, who has appeared as Attorney for the Defendant in
this cause, as Guardian ad Litem for the Defendant, WILLIAM CHARLES
WILLETT, a Minor, to defend this cause for said Minor.


JOHN V. DUCK, Attorney for Plaintiff



LARRY WAYNE BOBO, a Minor,
who sues by his father and next
friend, E. D. BOBO,

Plaintiff,

vs.

WILLIAM CHARLES WILLETTT,

Defendant.

) IN THE CIRCUIT COURT OF
(
* BALDWIN COUNTY, ALABAMA
*

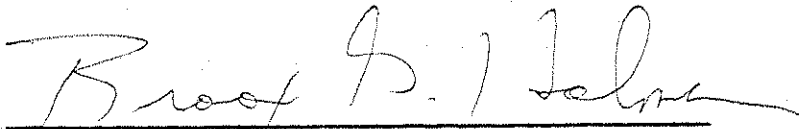
AT LAW

CASE NO. _____

P L E A

Comes now the Defendant in the above styled cause and for answer
to the Complaint, and to each and every count thereof, separately and sev-
erally, files the following separate and several pleas:

1. Not guilty.



BROOX G. HOLMES, Attorney for Defen-
dant and Guardian ad Litem for Defendant,
WILLIAM CHARLES WILLETTT, a Minor.

Service of the foregoing Plea accepted by me, as Attorney for the
Plaintiff, on this 31st day of Oct, 1966.


JOHN V. DUCK, Attorney for Plaintiff

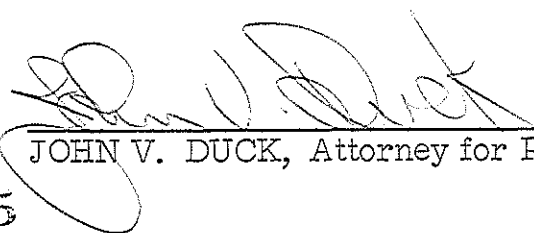
LARRY WAYNE BOBO, a Minor,)	IN THE CIRCUIT COURT OF
who sues by his father and next	(
friend, E. D. BOBO,	*	BALDWIN COUNTY, ALABAMA
	*	
Plaintiff,)	
	(
vs.	*	AT LAW
)	
WILLIAM CHARLES WILLETT,	(
	*	
Defendant.	*	CASE NO. <u>1234</u>

COMPLAINT ---

COUNT ONE

Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND 00/100 DOLLARS (\$750.00), damages, for that heretofore and on, to-wit: The 30th day of June, 1966, the Plaintiff was a passenger for hire and not a guest in an automobile driven by the Defendant, WILLIAM CHARLES WILLETT, and on said date, the Defendant so negligently operated the said automobile on Highway No. 27 (sometimes known as Bel Forest Road), a public highway in Baldwin County, Alabama, at a point approximately one mile north of Klump Airport near Fairhope, Alabama, as to cause or allow the wheel to come off of said automobile and the automobile to run off of the said highway. And as a proximate result of the negligence of the Defendant, as aforesaid, the Plaintiff was injured and damaged as follows, to-wit: His body was bruised, cut and broken; he was made sick, sore and lame; he was caused to suffer physical and mental pain and anguish, still so suffers and will so suffer in the future; he was permanently injured and disabled; he sustained severe myofascial and ligamentous strain of the neck, temporary hearing loss, headaches, nausea and blurred vision; hence, this suit.

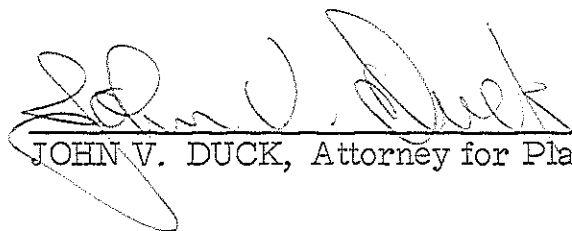
FILED
JUN 31 1966
JOHN V. DUCK, CLERK
BALDWIN COUNTY, ALA.


JOHN V. DUCK, Attorney for Plaintiff

LARRY WAYNE BOBO, a Minor,)	IN THE CIRCUIT COURT OF
who sues by his father and next	(
friend, E. D. BOBO,	*	BALDWIN COUNTY, ALABAMA
	*	
Plaintiff,)	
	(
vs.	*	AT LAW
)	
WILLIAM CHARLES WILLETT,	(
	*	
Defendant.	*	CASE NO. <u>7234</u>

M O T I O N

Comes now the Plaintiff and respectfully moves the Court to appoint BROOX G. HOLMES, who has appeared as Attorney for the Defendant in this cause, as Guardian ad Litem for the Defendant, WILLIAM CHARLES WILLETT, a Minor, to defend this cause for said Minor.



 JOHN V. DUCK, Attorney for Plaintiff

FILED
 OCT 31 1966
 CLERK
 BALDWIN COUNTY, ALA.

LARRY WAYNE BOBO, a Minor,)	IN THE CIRCUIT COURT OF
who sues by his father and next	(
friend, E. D. BOBO,	*	BALDWIN COUNTY, ALABAMA
	*	
Plaintiff,)	
	(
vs.	*	AT LAW
)	
WILLIAM CHARLES WILLETT,	(
	*	
Defendant.	*	CASE NO. <u>7434</u>

P L E A

Comes now the Defendant in the above styled cause 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.

Broox G. Holmes
 BROOX G. HOLMES, Attorney for Defendant and Guardian ad Litem for Defendant, WILLIAM CHARLES WILLETT, a Minor.

Service of the foregoing Plea accepted by me, as Attorney for the Plaintiff, on this 31st day of Oct, 1966.

John V. Duck
 JOHN V. DUCK, Attorney for Plaintiff

FILED

OCT 31 1966

ALICE I. DUCK, CLERK
 REGISTER

The State of Alabama, Baldwin County

At Law
CIRCUIT COURT, IN EQUITY

No. 7234 Term, 19 66

LARRY WAYNE BOBO, a minor who sues by his father and next friend Plaintiff
vs. E. D. BOBO Complainants

WILLIAM CHARLES WILLETT Defendants

In this cause it is made to appear to the clerk Register by the

that the Defendant LARRY WAYNE BOBO

is, in the belief of affiant, ~~an infant~~ a minor under the age of fourteen years;

and that a Summons on the Bill of Complaint in this cause, was served upon the

_____ of said ~~infant~~ minor on
the _____ day of _____, 19 66; and it further appearing that

Broox G. Holmes is in all respects a suitable
person to act as Guardian ad Litem for said infant; and the said

Broox G. Holmes having filed his consent, in
writing, to act as such;

It is now therefore ordered by the Register of said Court that

Broox G. Holmes
be, and he is hereby appointed Guardian ad Litem in this cause for the said infant. Defendant.

Witness my hand, this 31 day of October, 19 66.

Eric J. Drake, Register.

ACCEPTANCE

I, _____ hereby accept the above
appointment as Guardian ad Litem, and consent to act as such in the above cause.

Witness my hand, this _____ day of _____, 19 _____.

No. Page.

The State of Alabama

..... COUNTY

CIRCUIT COURT, IN EQUITY

.....
vs. Complainants.

.....
Defendants.

APPOINTMENT AND ACCEPTANCE OF GUARDIAN AD LITEM

Issued, 19.....

Filed, 19.....

....., Register.

Recorded iii

Vol. Page.

....., Register.