

FLOSSIE MAE HADLEY, a minor	X	
suing by and through		
FLOSSIE HADLEY as next friend,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
STAFF CHEVROLET CO., INC.,	X	AT LAW
a corporation, and		
THEODORE STAFF,	X	
Defendants.	X	

Come now the Defendants in the above styled cause by and through their Attorneys of Record and for answer to the Complaint heretofore filed against them plead, separately and severally, as follows:

1. Not guilty.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Defendants

FILED
NOV 15 1966
ALICE L. DUCK, CLERK
REGISTERED

STATE OF ALABAMA

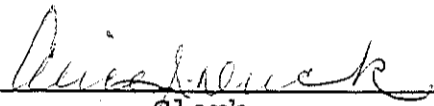
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Staff Chevrolet Co., Inc., a corporation, and Theodore Staff 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 Flossie Mae Hadley, a minor suing by and through Flossie Hadley as next friend.

Witness my hand this 15 day of November, 1966.


Clerk

FLOSSIE MAE HADLEY, a minor X
suing by and through X
FLOSSIE HADLEY as next X
friend, X

Plaintiff, X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

vs X

STAFF CHEVROLET CO., INC, X
a corporation, and X
THEODORE STAFF, X

Defendants. X

AT LAW

NO. 7261

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Eight Hundred Ninety-six Dollars and Fifty cents (\$896.50) for damages for that heretofore on, to-wit: the 17th day of September, 1966 at a point on South Main Street in the City of Atmore, Alabama, the Defendant, Staff Chevrolet Co., Inc., acting by and through

its agent, servant or employee Theodore Staff, who was then and there acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle in which the Plaintiff was riding as a passenger and as a proximate result of such negligence of said Defendants the Plaintiff was injured in that she suffered a broken nose, lacerations of the forehead and a concussion, all to the damage of the Plaintiff in the sum aforesaid, whence this suit.

Walter S. Patton

Attorney for Plaintiff

FILED

MAY 15 1966

ALICE J. DUCK, CLERK
REGISTER