

HARRY G. HALL, a minor,
suing by and through Ed
Hall as next friend,

X

X

Plaintiff,

X

vs.

X

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

X

X

Defendants.

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

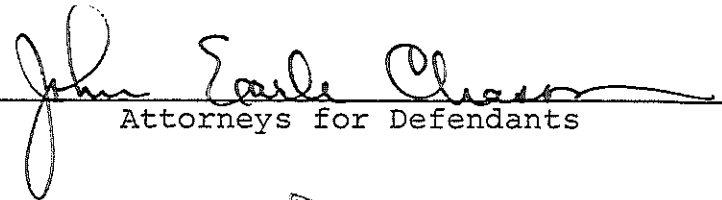
AT LAW

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:


Attorneys for Defendants

FILED
NOV 15 1966
ALICE J. DUCK, CLERK
REGISTER

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 Harry G. Hall, a minor, suing by and through Ed Hall, as next friend.

Witness my hand this 15th day of November, 1966.


Clerk

HARRY G. HALL, a minor,
suing by and through Ed
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Plaintiff,

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IN THE CIRCUIT COURT OF

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BALDWIN COUNTY, ALABAMA

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Defendants.

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AT LAW

NO. 7262

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Nine Hundred Seventy-nine Dollars and Ninety-five cents (\$979.95) 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 which the Plaintiff was driving and as a proximate result of such negligence of said Defendants the Plaintiff was injured in that he suffered a contusion of the left flank and hematulia, all to the damage to the Plaintiff in the sum aforesaid, whence this suit.

Walter J. Patton

Attorney for Plaintiff

FILED

NOV 15 1930

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REGISTER