

HONOREE ANDERSON, a minor,  
suing by and through her  
mother, CAROL ANDERSON,

Plaintiff,

vs.

ELLIS J. WHIDBEE,

Defendant.

)  
) IN THE CIRCUIT COURT OF

)  
) BALDWIN COUNTY, ALABAMA

)  
) LAW SIDE.  
)

ANSWER:

Comes now the Defendant, and for answer to the Plaintiff's  
complaint sets down and assigns the following separate and several  
pleas:

1. Not guilty.
2. The material a-legations of the complaint are untrue.

*J. Cannon Owens, Jr.*  
Attorney for Defendant.

Service accepted this 10<sup>th</sup>  
day of January, 1967.

*J. Cannon Owens, Jr.*  
Attorney for Plaintiff.

FILED

JAN 10 1967

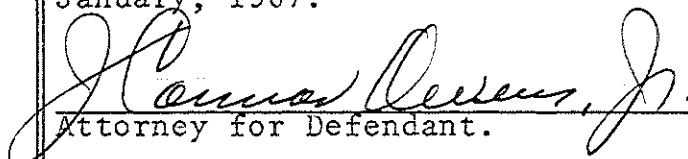
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HONOREE ANDERSON, a minor,	)	
suing by and through her	)	
mother, CAROL ANDERSON,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
	)	
vs.	)	
ELLIS J. WHIDBEE,	)	LAW SIDE.
	)	7337
Defendant.	)	

The Plaintiff claims of the Defendant THREE HUNDRED DOLLARS (\$300.00) as damages for that heretofore, on, to-wit, September 16, 1966, the Defendant, Ellis J. Whidbee, so negligently operated a motor vehicle on and along Alabama Highway No. 138, also known as Hurricane Road, at a point thereon approximately one-fourth of a mile West of the junction of the said Alabama Highway No. 138, with U. S. Highway No. 31, which road is a public road in Baldwin County, Alabama, so as to cause or allow the said motor vehicle to collide with the Plaintiff, who was then and there a pedestrian crossing Alabama Highway No. 138, and as a direct and proximate consequence of Defendant's negligence as aforesaid, the Plaintiff was injured in that her body was bruised; her right arm was fractured; she suffered physical pain and mental anguish; she was hospitalized, all for which the Plaintiff sues.

  
Attorney for Plaintiff.

Service accepted this 10<sup>th</sup> day of  
January, 1967.

  
Attorney for Defendant.

FILED  
JAN 10 1967  
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