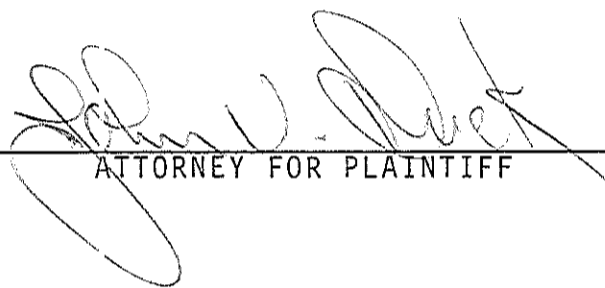


CHARLES N. ROLEY,)	IN THE CIRCUIT COURT OF	
Plaintiff,)	BALDWIN COUNTY, ALABAMA	
vs.)	AT LAW	NO. 7495
LINDA FAY JOHNSON, a Minor,)		
Defendant.)		

MOTION FOR APPOINTMENT OF
GUARDIAN AD LITEM

Comes now the Plaintiff in the above styled cause, and makes known to the Court that LINDA FAY JOHNSON is a Minor under the age of twenty-one years, and respectfully prays that this Honorable Court appoint a Guardian Ad Litem to represent her interest in this matter.


ATTORNEY FOR PLAINTIFF

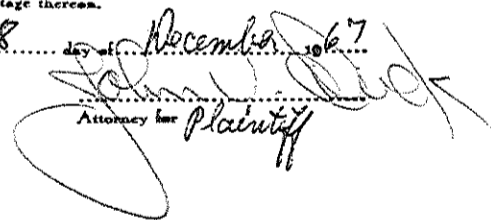
FILED

DEC 20 1967

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 18 day of December, 1967


Attorney for Plaintiff

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LINDA FAY JOHNSON

.....
.....
.....

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

..... LINDA FAY JOHNSON, Defendant.....

by CHARLES N. ROLEY

....., Plaintiff.....

Witness my hand this..... 27 day of April 1967.....

.....
..... Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

CHARLES N. ROLEY

Plaintiffs

vs.

LINDA FAY JOHNSON

Defendants

SUMMONS AND COMPLAINT

Filed APR 27 1967 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Alabama

RECEIVED

Received In Office

APR 28 1967

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this May 2 1967

by leaving a copy with

Linda Fay Johnson

Shank claims

Don. Cents per mile

TAYLOR WILKINS

Deputy Sheriff

Sheriff

Sheriff

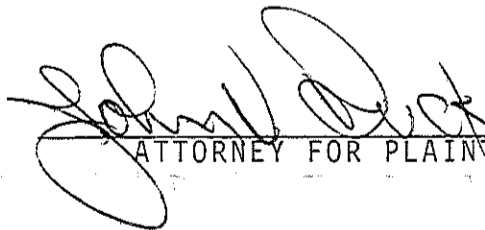
Deputy Sheriff

2 miles north of Bay

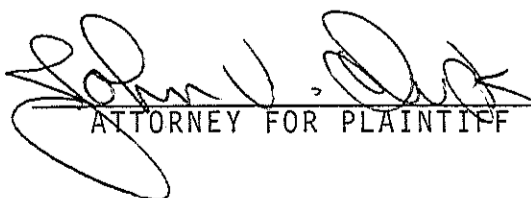
CHARLES N. ROLEY,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
LINDA FAY JOHNSON, a Minor,)	no. 7495
Defendant.)	

Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY (\$750.00) DOLLARS as damages, for that on, to-wit: the 13th day of September, 1966, the Plaintiff's automobile was being operated along and upon a public street in the City of Bay Minette, Alabama, on, to-wit: Hand Avenue with it's intersection with Fifth Street, and while said automobile was being operated and driven along the said Hand Avenue at it's intersection with Fifth Street, which was then a public highway in Baldwin County, Alabama, an automobile which was being driven by the Defendant ran upon, over or against the automobile of the Plaintiff, causing great damages and injuries to the Plaintiff's automobile: to-wit: The Plaintiff's automobile was rendered a total loss, all to the damage of the Plaintiff as aforesaid.

Plaintiff alleges that his said damages to his said automobile were proximately caused by the negligence of the Defendant in that she negligently caused, allowed or permitted said automobile to run upon, over or against the automobile of the Plaintiff and as a proximate consequence thereof, the Plaintiff's automobile was damaged and injured as aforesaid, hence this suit.


ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands
a Trial by Jury.


ATTORNEY FOR PLAINTIFF

FILED
APR 27 1967
AINE J. DUCK, CLERK
REGISTER

CHARLES N. ROLEY,
Plaintiff,
Vs.
LINDA FAY JOHNSON,
a Minor,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 7495

DEMURRER

Comes now the Defendant, Linda Fay Johnson, by her attorney, Kenneth Cooper, Esquire, and demurs to the complaint heretofore filed in this cause, and as grounds for said demurrer assigns the following, separately and severally, to each and every count thereof, to-wit:

1. For aught that appears, the Defendant is not of legal age.
2. The damages caused to Plaintiff's automobile are not sufficiently described.
3. Amount of damages claimed by the Plaintiff is not certain.
4. The time of the accident is not stated.
5. Plaintiff fails to allege who was the operator of his automobile.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

I hereby certify that I have served a copy of the foregoing on Hon. John V. Duck, Attorney At Law, Fairhope, Alabama, counsel for Plaintiff herein by depositing a copy of same in the United States mail at Bay Minette, Alabama, addressed to him as above indicated by first class mail, postage prepaid, on this 23 day of May, 1967.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

FILED

MAY 24 1967

JOHN V. DUCK, CLERK
REGISTER