

ARMBRECHT, JACKSON & DEMOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

AREA CODE 205
PHONE 432-6751

CABLE ADDRESS
SEALAW

WM. H. ARMBRECHT
THEODORE K. JACKSON
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOK G. HOLMES
W. BOYD REEVES
JOHN GROW
LOUIS H. ANDERS, JR.
FRANK B. MCRIGHT
Y. D. LOTT, JR.

August 14, 1967

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: Susan Kaye Fincher, a Minor
v. Leon Webb
At Law - Case No. 7623

James Boykin, Minor v. Leon Webb
At Law - Case No. 7624

Thomas Fincher, Jr., Minor
v. Leon Webb
At Law - Case No. 7625

Andy Dobbins, Minor v. Leon Webb
At Law - Case No. 7626

Thomas Fincher v. Leon Webb
At Law - Case No. 7627


Dear Mrs. Duck:

Enclosed please find Plea in each of the above cases which we wish to file on behalf of the Defendant, Leon Webb. We have mailed a copy of each to Harry W. Wilters, Jr., Esquire, Attorney for the Plaintiffs.

Very truly yours,

ARMBRECHT, JACKSON & DeMOUY

By:


BROOK G. HOLMES

BGH:ba
Encls.

SUSAN KAYE FINCHER, a Minor,)	IN THE CIRCUIT COURT OF
by MARY FINCHER, her next of	(
friend,	*	BALDWIN COUNTY, ALABAMA
	*	
Plaintiff,)	
	(
vs.	*	AT LAW
	*	
LEON WEBB,)	
	(
Defendant.	*	CASE NO. 7623

P L E A

Comes now the Defendant in the above styled cause and for answer to Plaintiff's Complaint, as a whole and to each and every count thereof, separately and severally, files the following separate and several pleas:

1. Not guilty.

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Defendant

By: Brook G. Holmes
BROOK G. HOLMES

Defendant respectfully demands trial by jury.

Brook G. Holmes
BROOK G. HOLMES

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 14th day of Aug, 1967, served a copy of the foregoing pleading on counsel for all parties to this proceeding, by mailing the same by United States mail, properly addressed, and first class postage prepaid.

Brook G. Holmes

FILED

AUG 15 1967

ALICE J. DUCK

CLERK
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Leon Webb, 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 the same, then and there to answer the Complaint of Susan Kaye Fincher, a minor, by Mary Fincher, her next of friend.

Witness my hand, this the 14 day of July, 1967.

Alvin J. J. J.
Clerk,

SUSAN KAYE FINCHER, a minor, X
by MARY FINCHER, her next of X
friend, X IN THE CIRCUIT COURT OF
Plaintiff, X BALDWIN COUNTY, ALABAMA
vs. X AT LAW
LEON WEBB, X CASE NO. 7423
Defendant. X
1.

Plaintiff, a minor, suing by and through her next of friend, Mary Fincher, claims of the Defendant, the sum of SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$7,500.00), as damages, for that heretofore on, to-wit, the 27th day of February, 1967, at a point approximately 9/10 mile East of the Mobile-Baldwin County Alabama line on U. S. Highway #90, the Plaintiff was driving a motor vehicle on said highway, a place where she had a right to be, and while she was driving along said highway, the Defendant negligently drove his truck in front of the motor vehicle being driven by the Plaintiff causing the Plaintiff to drive into the truck of the Defendant, and as a direct, proximate result of the negligence aforesaid, the Plaintiff was injured and damaged as follows: She sustained serious lacerations of her right arm; her head was bruised; she was

bruised or wrenched and springed about the body and her whole physical being was shaken and shocked, and she was made sick and sore and was caused to suffer great physical and mental anguish; that the Plaintiff was caused to incur expenses in and about acquiring doctors, medicine, medical aid and attention, and treatment of said injuries, all a result of the Defendant's negligence.

WILTERS & BRANTLEY

BY: 

Defendants address is:

1452 Brown Street
Mobile, Alabama

FILED

JUL 14 1967

CLERK
RECEIVED

RECEIVED

JUL 14 1967

TAYLOR WILKINS

BUR

41265

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 7623

SUSAN KAYE FINCHER, a minor,
by MARY FINCHER, her next of
friend,

Plaintiff,

vs.

LEON WEBB,

Defendant.

SUMMONS AND COMPLAINT

WILTERS & BRANTLEY
Attorneys at Law
Bay Minette, Alabama

Received 17 Day of July 1967
and on 25 Day of July 1967
I served a Copy of the within on Leon Webb
by service on _____

RAY D. BRIDGES, Sheriff
By N. Busby D.S.

JUL 17 3 54 PM '67
RECD. SHERIFF DEPT.
BALDWIN COUNTY, ALA.