

JAMES BOYKIN, a Minor, by his)	IN THE CIRCUIT COURT OF
next of friend, MARY BOYKIN,	(
	*	BALDWIN COUNTY, ALABAMA
Plaintiff,	*	
)	
vs.	(
	*	AT LAW
LEON WEBB,	*	
)	
Defendant.	(CASE NO. 7624

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: _____

BROOX G. HOLMES

Defendant respectfully demands trial by jury.

BROOX 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.

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 James Boykin, a minor by his next of friend, MARY BOYKIN.

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

Wing Leach
Clerk,

JAMES BOYKIN, a minor by his X
next of friend, MARY BOYKIN, X
Plaintiff, X IN THE CIRCUIT COURT OF
vs. X BALDWIN COUNTY, ALABAMA
LEON WEBB, X AT LAW
Defendant. X CASE NO. 76 24
X
1.

The Plaintiff, James Boykin, a minor, suing by his next of friend, Mary Boykin, claims of the Defendant, 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 riding in an automobile on said public highway, a place where he had a right to be, and that the Defendant did negligently drive his truck in front of the motor vehicle in which the Plaintiff was riding, causing the said vehicle to run into and against the truck of the Defendant, and by reason of and as a proximate result and consequence of the said negligence of the Defendant, the Plaintiff was injured, to-wit: He received a serious laceration over the right deltoid muscle area, his

right shoulder was badly bruised and his ribs on his right side were injured, he received a whip lash injury to his neck and he was bruised about his body; his whole physical being was shaken and shocked, and he 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 injured, all a result of the Defendant's negligence.

WILTERS & BRANTLEY

BY: 

Defendant's address is:

1452 Brown Street
Mobile, Alabama

FILED

JUL 14 1967



RECEIVED

JUL 14 1967

TAYLOR WILKINS
SHERIFF

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 h. B. Bridges, D. 3.

Bus

4266

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7624

JAMES BOYKIN, a minor, by his
next of friend, MARY BOYKIN,

Plaintiff,

vs.

LEON WEBB,

Defendant.

SUMMONS AND COMPLAINT

WILTERS & BRANTLEY
Attorneys at Law
Bay Minette, Alabama