

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 Thomas Fincher, Jr., a minor by his next of friend, Mary Fincher.

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

Mary Fincher
Clerk,

THOMAS FINCHER, JR., a minor	X	
by his next of friend, MARY		
FINCHER,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	X	AT LAW
LEON WEBB,	X	CASE NO. <u>7625</u>
Defendant.	X	

1.

The Plaintiff, Thomas Fincher, Jr., a minor, suing by his next of friend, Mary Fincher, claims of the Defendant, ONE THOUSAND DOLLARS (\$1,000.00), 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 cut on his lip; blurred vision caused by

a lick on the head; he was burised or wrenched and springed about the body and 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, medecine, medical aid and attention and treatment of said injuries, 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

LEONOR WILKINS
SHERRILL

Per 4266

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7625

THOMAS FINCHER, JR., a minor,
by his next of friend, MARY
FINCHER,

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.

NOT RECORDED
JUL 14 1967
JUL 14 1967

THOMAS FINCHER, JR., a Minor,)	IN THE CIRCUIT COURT OF
by his next of friend, MARY FINCHER,	(
	*	BALDWIN COUNTY, ALABAMA
Plaintiff,	*	
)	
vs.	(
	*	AT LAW
LEON WEBB,	*	
)	
Defendant.	(CASE NO. 7625

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

BROOX G. HOLMES

Defendant respectfully demands trial by jury.

Broox G. Holmes
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.

Broox G. Holmes

FILED

AUG 15 1967

ALICE J. DUCK

CLERK
REGISTER