

ANDY DOBBINS, a Minor, by his  
next of friend, IRENE DOBBINS,

Plaintiff,

vs.

LEON WEBB,

Defendant.

) IN THE CIRCUIT COURT OF  
(  
\* BALDWIN COUNTY, ALABAMA  
\*

AT LAW

CASE NO. 7626

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

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 Andy Dobbins, a minor, by his next of friend, Irene Dobbins.

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

Irene Dobbins  
Clerk

ANDY DOBBINS, a minor, by X  
his next of friend, IRENE X  
DOBBINS, X IN THE CIRCUIT COURT OF  
Plaintiff, X BALDWIN COUNTY, ALABAMA  
vs. X AT LAW  
LEON WEBB, X CASE NO. 7626  
Defendant. X  
1.

The Plaintiff, Andy Dobbins, a minor, suing by his next of friend, Irene Dobbins, 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 bad bruise on his head, 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, 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

CLERK  
REGISTERED

RECEIVED

JUL 14 1967

TAYLOR WILLIAMS  
SHERRILL

Bur  
4266

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY ALABAMA

AT LAW

CASE NO.

16946

ANDY DOBBINS, a minor, by  
his next of friend, TREN  
DOBBINS,

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  
on 25 Day of July 1967  
by service on Ray D. Bridges, Sheriff

By h Busby D. S.