


Defendants

No. \_\_\_\_\_

Answer

Come now Defendants in the above styled cause and for answer  
to the complaint say:

1. Not Guilty.

  
Attorney for Defendants

Defendants demand trial

by jury this 24th day

of October, 1967.

of October, 1967.

W. L. Hays  
Attorney for Defendants

# CERTIFICATE OF SERVICE

I do hereby certify that I have on this 24 day of Oct 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, with first class postage prepaid.

Neil Ray

Filed 10-24-67  
Deice French  
clerk

LESLIE MORTON MELTON,	0	In the Circuit Court
	-	
Plaintiff	0	of Baldwin County,
	-	
vs.	0	Alabama
	-	
Earnest Earl Dailey and	0	At Law
Willie Frank Harris,	-	
	0	No. 7697
Defendants	-	
	0	

Answer

Come now Defendants in the above styled cause and for answer to the complaint say:

1. Not Guilty.

W. L. Hay  
Attorney for defendants

Defendants demand trial  
by jury this 24th day  
of October, 1967.

W. L. Hay  
Attorney for Defendants

#### CERTIFICATE OF SERVICE

I do hereby certify that I have on this 24 day of Oct, 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, with first class postage prepaid.

W. L. Hay

Filed 10-24-67  
Baig-rench  
ccr

STATE OF ALABAMA

CIRCUIT COURT - AT LAW

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Earnest Earl Dailey and Willie Frank Harris 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 same, then and there to answer the Complaint of Leslie Morton Melton.

Witness my hand this 22 day of August, 1967.

Alice D. Duck  
Clerk

LESLIE MORTON MELTON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
EARNEST EARL DAILEY	X	AT LAW
and WILLIE FRANK	X	
HARRIS,	X	7 6 9 7
Defendants.	X	

COUNT ONE

The Plaintiff claims of the Defendants the sum of Five Thousand Dollars (\$5,000.00) as damages for that on, to-wit: the 11th day of August, 1967, at approximately 6:35 P. M. at the intersection of Hall Avenue and 7th Street in the City of Bay Minette, Baldwin County, Alabama, the Defendants, who were then and there engaged in a joint venture, so negligently operated an automobile in which they were riding so as to cause the same to collide with an automobile in which the Plaintiff was riding and as a proximate result of such negligence, the Plaintiff sustained the following

injuries and damages, viz: he received a laceration behind his right ear and a contusion or abrasion over his right eye; he was made sick, sore and lame for a period of several days and suffered considerable pain, suffering and anxiety as a result of said injuries, and he was caused to incur medical expenses as a result of said accident; his automobile was damaged in that its front fenders, bumper, grill and headlight assembly, its hood and front windshield and both front wheels were bent, damaged or broken and its frame was twisted, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendants the sum of Five Thousand Dollars (\$5,000.00) as damages for that on, to-wit: the 11th day of August, 1967, at approximately 6:35 P.M. at the intersection of Hall Avenue and 7th Street in the City of Bay Minette, Baldwin County, Alabama, the Defendant Earnest Earl Dailey, who was then and there the agent, servant or employee of the Defendant Willie Frank Harris and who was at such time and place acting within the line and scope of his authority as such agent, servant or employee so negligently operated an automobile so as to cause the same to collide with an automobile in which the Plaintiff was riding and as a proximate result of such negligence, the Plaintiff sustained the following injuries and damages, viz: he received a laceration behind his right ear and a contusion or abrasion over his right eye; he was made sick, sore and lame for a period of several days and suffered considerable pain, suffering and anxiety as a result of said injuries, he was caused to incur medical expenses as a result of said accident; his automobile was damaged in that its front fenders, bumper, grill and headlight assembly, its hood and front windshield and both front wheels were bent, damaged

or broken and its frame was twisted, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earl Chason

Defendant's Addresses:

Earnest Earl Dailey  
Route 2, Box 255  
Evergreen, Alabama

Willie Frank Harris  
Route 2, Box 160 B  
Evergreen, Alabama

FILED

AUG 22 1967

ALICE J. DUCK CLERK  
REGISTER

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RECEIVED

AUG 22 1967

TAYLOR WILKINS  
SHERIFF

Received in office this the \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

I have executed the within leaving copy thereof

with Ernest Earl Dailey (stamp)

defendant named has in and to the \_\_\_\_\_ day of \_\_\_\_\_ 1967

of James M. Fork 1967

JAMES M. FORK, SHERIFF

By Clifford Deputy

1691  
LESLIE MORTON MELTON,

Plaintiff,

vs.

EARNEST EARL DAILEY and  
WILLIE FRANK HARRIS,

Defendants.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \*

SUMMONS AND COMPLAINT

\* \* \* \* \*

FILED

AUG 22 1967

ALICE J. DUCK CLERK  
REGISTER

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. BOX 120  
BAY MINETTE, ALABAMA