LUTHER E. HATFIELD, suing as Father and) IN THE CIRCUIT COURT OF next friend of RANDY L. HATFIELD, a minor,

Plaintiff,

VS.

DONALD W. HATFIELD and MARY HATFIELD,) jointly and individually,

Defendants.

COUNT ONE

Plaintiff, a minor, suing by his Father and next friend, LUTHER E. HATFIELD, claims of the Defendants the sum of ONE THOU-SAND TWO HUNDRED FIFTY (\$1,250.00) as damages, for that heretofore on, to-wit: the 25th day of February, 1967 the Defendants owned and kept on their premises, a large vicious horse, and the Defendents knew that he would attack and kick persons. The Plaintiff avers that the Defendants knew that the said horse was vicious and owed a duty to safely and securely keep said horse. The Plaintiff avers that they breached said duty in this, that they did not securely or safely keep the said horse, and that as a proximate result of the breach of said duty owing to the Plaintiff as aforesaid, said horse kicked the Plaintiff in the stomach, and as a proximate result of said attack and kick, the Plaintiff became sick and his duodenum was ruptured, his spleen was ruptured, his stomach became sore and inflamed, and that the Plaintiff has suffered painfully and has frequently been unable to sleep as a proximate result of the attack and kick of the said horse aforesaid, hence this suit.

Som Multiple Some Plaintiff



LUTHER E. HATFIELD, suing as Father and) next friend of RANDY L. HATFIELD, a minor,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

Plaintiff,) A

AT LAW

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720.7792

DONALD W. HATFIELD and MARY HATFIELD,) jointly and individually,

Defendants.

COUNT ONE

Plaintiff, a minor, suing by his Father and next friend, LUTHER E. HATFIELD, claims of the Defendants the sum of ONE THOU-SAND TWO HUNDRED FIFTY (\$1,250.00) as damages, for that heretofore on, to-wit: the 25th day of February, 1967 the Defendants owned and kept on their premises, a large vicious horse, and the Defendents knew that he would attack and kick persons. The Plaintiff avers that the Defendants knew that the said horse was vicious and owed a duty to safely and securely keep said horse. The Plaintiff avers that they breached said duty in this, that they did not securely or safely keep the said horse, and that as a proximate result of the breach of said duty owing to the Plaintiff as aforesaid, said horse kicked the Plaintiff in the stomach, and as a proximate result of said attack and kick, the Plaintiff became sick and his duodenum was ruptured, his spleen was ruptured, his stomach became sore and inflamed, and that the Plaintiff has suffered painfully and has frequently been unable to sleep as a proximate result of the attack and kick of the said horse aforesaid, hence this suit.

ATTORNEY FOR PLAINTIFF



RANDY L. HATFIELD, a minor, suing by and	X	
through LUTHER E. HATFIELD as his Father	X	IN THE CIRCUIT COURT OF
and next friend,	X	BALDWIN COUNTY, ALABAMA
Plaintiff,	X	DAIDWIN COUNTY, ALADAMA
vs.	X	AT LAW
	X	
DONALD HATFIELD and MARY HATFIELD, Defendants.	χ	
	X	
Defendants.	χ	

Come now the Defendants in the above styled cause, by their attorneys, and for answer to the Complaint heretofore filed against them, plead as follows:

1. Not guilty.

CHASON, STONE & CHASON

By:

Attorneys for Defendants

NOV 2 1 1967

ALCE J. DUCK CLERK REGISTER