ANGELA RENE WHITE, a minor, by her next friend and father, ELBERT EDMONDSON WHITE,

Plaintiff,

vs.

TOWN OF GULF SHORES, a Municipal Corporation,

Defendant.

Defendant.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED DOLLARS (\$500.00) for that, heretofore, on, to-wit, February 18, 1967, the Plaintiff, who is a minor of four years of age, was playing in a public park operated and maintained by the Defendant, said park being known as Gulf Shores Park, and at said time and place the Defendant maintained and operated certain equipment, including a merry-go-round, and at said time and at said place the said merry-go-round was defective in that the threads on the end of the center pole were exposed and as a result of the negligence of said Defendant in failing to repair or properly maintain said merry-go-round, the Plaintiff became entangled in the said merry-go-round while playing thereon, and as a proximate consequence of the negligence of the Defendant aforesaid the Plaintiff was injured as follows: she suffered a compound communited fracture of the right tibia and fibula, loss of tissue, numerous cuts and bruises and other contusions and was caused to undergo medical treatment, pain and suffering, all to the damage of the Plaintiff aforesaid, hence this suit.

JOHN EARLE CHASON, Attorney for Plaintiff

Now comes J. Connor Owens, Jr., Attorney for Defendant, and accepts service of the foregoing complaint.

NDV 1 , 1987

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ANGELA RENE WHITE, a minor, )
by her next friend and father,
ELBERT EDMONDSON WHITE, )

Plaintiff, )

Plaintiff, )

BALDWIN COUNTY, ALABAMA

vs. )

TOWN OF GULF SHORES, a )
Municipal Corporation, )

Defendant. )

Now comes the Defendant in the above styled cause and for answer to the complaint heretofore filed says as follows:

1. Not guilty.

OWENS AND PATTON

By:

Attorneys for Defendant.

NOV 1.1967

ALIEE D. BEER REGISTER