

JAMES G. ENGLISH, SR., suing )  
as Father and Next Friend of )  
JAMES G. ENGLISH, JR., a Minor, )

Plaintiff, )

vs. )

JOE Z. T. McCANTS, SR. and )  
JOE Z. T. McCANTS, JR., a )  
Minor, )

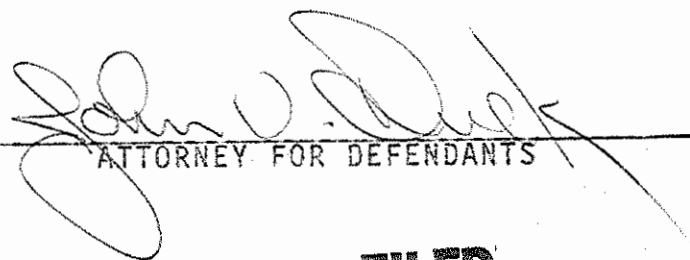
Defendants. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Defendants in the above styled cause, and  
for answer to the Bill of Complaint filed herein says:

Not guilty.

  
ATTORNEY FOR DEFENDANTS

**FILED**

NOV 7 1967

**ALICE J. DUCK** CLERK  
REGISTER

|                                 |   |                         |
|---------------------------------|---|-------------------------|
| JAMES G. ENGLISH, SR., suing    | ) | IN THE CIRCUIT COURT OF |
| as Father and Next Friend of    | ) | BALDWIN COUNTY, ALABAMA |
| JAMES G. ENGLISH, JR., a Minor, | ) |                         |
| Plaintiff,                      | ) | AT LAW                  |
| vs.                             | ) |                         |
| JOE Z. T. McCANTS, SR. and      | ) |                         |
| JOE Z. T. McCANTS, JR., a       | ) |                         |
| Minor,                          | ) |                         |
| Defendant,                      | ) |                         |

The Plaintiff, a Minor, suing by his Father and Next Friend, JAMES G. ENGLISH, SR., claims of the Defendants the sum of ONE THOUSAND TWO HUNDRED FIFTY (\$1,250.00) DOLLARS as damages, for that heretofore on, to-wit: the 3rd day of September, 1967, the said Defendant, JOE Z. T. McCANTS, SR. did own and possess an automobile which he did loan to his minor son, JOE Z. T. McCANTS, JR., a youth under the age of eighteen (18) years, and did then negligently permit and allow the said JOE Z. T. McCANTS, JR. to to take and drive the same for his own personal pleasure and entertainment, and for the pleasure and entertainment of such other persons as he might invite and take into said automobile with him, unaccompanied by the said Defendant, JOE Z. T. McCANTS, SR., or any other adult person, although as Plaintiff avers, the said JOE Z. T. McCANTS, JR. was wholly incompetent and unfit to drive said automobile, as was then well known to the said Defendant, JOE Z. T. McCANTS, SR.; that on said day and on said occasion, after nightfall, the said JOE Z. T. McCANTS, JR., being so possessed of said automobile, and in sole control of it's operation, did invite and take into said automobile, among other persons, all minors under the age of twenty-one (21) years, the said JAMES G. ENGLISH, JR., a minor son of the Plaintiff under the age of twenty-one (21) years, for a pleasure ride and thereupon he did drive said automobile with the said JAMES G. ENGLISH, JR. and others therein, on certain streets in the City of Fairhope, Alabama, and at the corner of Fairhope Avenue and east of Summit Street, did so negligently, carelessly and improperly operate

said automobile that the minor son of the Plaintiff, JAMES G. ENGLISH, JR., was thrown therefrom and was injured in that he suffered severe head injuries, that he was caused to spend large sums of money for doctors bills and hospital bills, and for medical attention and medical supplies in and about the healing of the wounds of the minor son, and that the said minor son was permanently injured, all as the proximate result of the said Defendant's negligence and the concurring negligence and incompetency of the said JOE Z. T. McCANTS, JR., as aforesaid, to the damage of the Plaintiff in the said sum of ONE THOUSAND TWO HUNDRED FIFTY (\$1,250.00) DOLLARS as aforesaid, wherefore the Plaintiff sues.

*James G. English, Jr.*  
JAMES G. ENGLISH, JR. by and through  
his duly authorized Attorney-in-  
Fact, LONI ENGLISH.

**FILED**

NOV 7 1967

**ALICE J. DUCK** CLERK  
REGISTER

|                                 |   |                         |
|---------------------------------|---|-------------------------|
| JAMES G. ENGLISH, SR., suing    | ) | IN THE CIRCUIT COURT OF |
| as Father and Next Friend of    | ) | BALDWIN COUNTY, ALABAMA |
| JAMES G. ENGLISH, JR., a Minor, | ) |                         |
| Plaintiff,                      | ) | AT LAW                  |
| vs.                             | ) | 7825                    |
| JOE Z. T. McCANTS, SR. and      | ) |                         |
| JOE Z. T. McCANTS, JR., a       | ) |                         |
| Minor,                          | ) |                         |
| Defendant,                      | ) |                         |

The Plaintiff, a Minor, suing by his Father and Next Friend, JAMES G. ENGLISH, SR., claims of the Defendants the sum of ONE THOUSAND TWO HUNDRED FIFTY (\$1,250.00) DOLLARS as damages, for that heretofore on, to-wit: the 3rd day of September, 1967, the said Defendant, JOE Z. T. McCANTS, SR. did own and possess an automobile which he did loan to his minor son, JOE Z. T. McCANTS, JR., a youth under the age of eighteen (18) years, and did then negligently permit and allow the said JOE Z. T. McCANTS, JR. to to take and drive the same for his own personal pleasure and entertainment, and for the pleasure and entertainment of such other persons as he might invite and take into said automobile with him, unaccompanied by the said Defendant, JOE Z. T. McCANTS, SR., or any other adult person, although as Plaintiff avers, the said JOE Z. T. McCANTS, JR. was wholly incompetent and unfit to drive said automobile, as was then well known to the said Defendant, JOE Z. T. McCANTS, SR.; that on said day and on said occasion, after nightfall, the said JOE Z. T. McCANTS, JR., being so possessed of said automobile, and in sole control of it's operation, did invite and take into said automobile, among other persons, all minors under the age of twenty-one (21) years, the said JAMES G. ENGLISH, JR., a minor son of the Plaintiff under the age of twenty-one (21) years, for a pleasure ride and thereupon he did drive said automobile with the said JAMES G. ENGLISH, JR. and others therein, on certain streets in the City of Fairhope, Alabama, and at the corner of Fairhope Avenue and east of Summit Street, did so negligently, carelessly and improperly operate

said automobile that the minor son of the Plaintiff, JAMES G. ENGLISH, JR., was thrown therefrom and was injured in that he suffered severe head injuries, that he was caused to spend large sums of money for doctors bills and hospital bills, and for medical attention and medical supplies in and about the healing of the wounds of the minor son, and that the said minor son was permanently injured, all as the proximate result of the said Defendant's negligence and the concurring negligence and incompetency of the said JOE Z. T. McCANTS, JR., as aforesaid, to the damage of the Plaintiff in the said sum of ONE THOUSAND TWO HUNDRED FIFTY (\$1,250.00) DOLLARS as aforesaid, wherefore the Plaintiff sues.

*James G. English, Jr.*  
JAMES G. ENGLISH, Jr. by and through  
his duly authorized Attorney-in-  
Fact, LONI ENGLISH.

**FILED**

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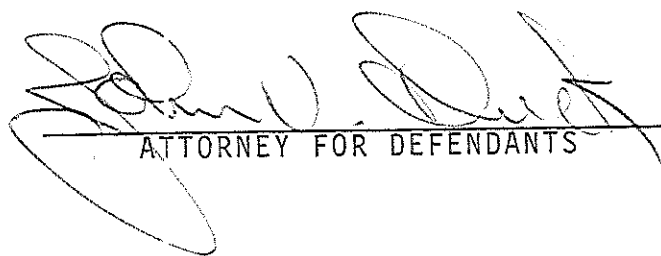
Defendants. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

7825

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for answer to the Bill of Complaint filed herein says:

Not guilty.

  
ATTORNEY FOR DEFENDANTS

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