

MICHAEL DEAN SALTER,
a minor, suing by his
Father and next friend,
OBIE LEE SALTER,

Plaintiff,

vs.

PERCY CECIL RASBERRY
and MILDRED ALBRIGHT,

Defendants.

X

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

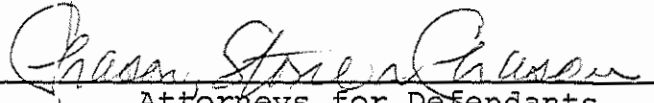
BALDWIN COUNTY, ALABAMA

AT LAW

PLEA:

Come the Defendants and for plea to the complaint filed
in the above styled cause, say:

1. Not guilty.


Attorneys for Defendants

FILED

FEB 5 1968

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Percy Cecil Rasberry and Mildred Albright 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 Michael Dean Salter, a minor, suing by his Father and next friend, Obie Lee Salter.

Witness my hand this 5 day of February, 1968.

Allice J. Duck
Clerk

MICHAEL DEAN SALTER,
a minor, suing by his
Father and next friend,
OBIE LEE SALTER,

Plaintiff,

vs.

PERCY CECIL RASBERRY
and MILDRED ALBRIGHT,

Defendants.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

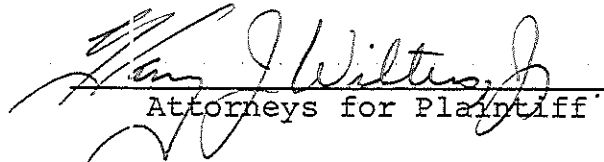
BALDWIN COUNTY, ALABAMA

AT LAW

7978

The Plaintiff claims of the Defendants the sum of Nine Hundred Twenty-two Dollars and Thirty Cents (\$922.30) as damages for that on, to-wit: October 28, 1967, the Defendant Percy Cecil Rasberry who was then and there the agent, servant or employee of the Defendant Mildred Albright and who was acting within the line and scope of his employment as such, so negligently drove an automobile on McKenzie Street in Foley, Baldwin County, Alabama as to cause or allow the same to run into or against a motor bike which was then and there being driven by the Plaintiff and as a proxi-

mate result of the negligence of such Defendants, the Plaintiff was injured in this: his motor bike was destroyed, he was injured, receiving a slight concussion and a colles' fracture, he was caused to lose time from his employment, he incurred medical and hospital expenses, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.


Attorneys for Plaintiff

FILED

FEB 5 1968

ALICE J. DUCK CLERK
REGISTER

MICHAEL DEAN SALTER, a minor,
suing by his Father and next
friend, OBIE LEE SALTER,

Plaintiff,

vs.

PERCY CECIL RASBERRY and
MILDRED ALBRIGHT,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *