

ELNORA GASKIN, A MINOR, SUING BY
AND THROUGH HER FATHER AND NEXT FRIEND,
EARLY GASKIN

Plaintiff

vs

DEBORAH ANN BURKARD, A MINOR, AND
MARTIN M. BURKARD, JOINTLY AND SEVERALLY

Defendants

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY ALABAMA

) AT LAW

) NO 8004

COUNT ONE

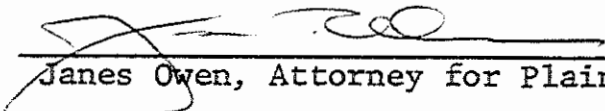
The plaintiff Elnora Gaskin, a Minor, suing by and through her father and next friend, Early Gaskin, claims of the defendants the sum of TWO HUNDRED AND NO/100 (\$200.00) DOLLARS for that heretofore on, to-wit, November 22, 1967, the plaintiff Elnora Gaskin was walking across Section Street, a public street in the City of Fairhope, County of Baldwin, State of Alabama, at or near the intersection of said street with Fairhope Avenue, a public street in said City, said County and said State, at which time and place the defendant Deborah Ann Burkard so negligently operated an automobile on said Section Street as to collide with plaintiff Elnora Gaskin. The plaintiff avers that at the time and place complained of Deborah Ann Burkard was an agent, servant or employee of defendant Martin M. Burkard, acting within the line and scope of her employment as such agent, servant or employee. The plaintiff avers that as a proximate consequence of the negligence of the defendants as aforesaid, the plaintiff Elnora Gaskin was bruised, lacerated, suffered physical pain and mental anguish and was permanently injured, all to the damages of the plaintiff as aforesaid. The plaintiff avers that the defendant Deborah Ann Burkard is a minor, sixteen (16) years of age and prays that this Honorable Court appoint a Guardian ad Litem for said minor in this suit.

FILED

FEB 22 1968

ALICE J. DUCK

CLERK
REGISTER


James Owen, Attorney for Plaintiff

I herewith accept service for the defendants.

Augustine Macker
22 Feb. 68

ELNORA GASKIN, A MINOR, SUING BY)	IN THE CIRCUIT COURT
AND THROUGH HER FATHER AND NEXT FRIEND,)	OF BALDWIN COUNTY
EARLY GASKIN)	
Plaintiff)	ALABAMA
vs)	
DEBORAH ANN BURKARD, A MINOR, AND)	AT LAW
MARTIN M. BURKARD, JOINTLY AND SEVERALLY)	
Defendants)	NO _____

Comes now defendant Deborah Ann Burkard, by her Guardian ad Litem, Augustine Meaher, III, and for answer to the complaint heretofore filed herein sets down and assigns the following pleas, separately and severally:

1. The material allegations are untrue.
2. Not guilty.

Augustine Meaher III
Augustine Meaher, III, Guardian Ad Lit
for Deborah Ann Burkard

FEB 22 1986

ALICE J. ...

ELNORA GASKIN, A MINOR, SUING BY)	IN THE CIRCUIT COURT
AND THROUGH HER FATHER AND NEXT FRIEND,)	OF BALDWIN COUNTY
EARLY GASKIN)	
Plaintiff)	ALABAMA
vs)	
)	AT LAW
DEBORAH ANN BURKARD, A MINOR, AND)	
MARTIN M. BURKARD, JOINTLY AND SEVERALLY,)	
Defendants)	NO _____

Come now the defendants through Augustine Meaher, III,
their attorney and accept service of process, and for answer
to the plaintiff's complaint say as follows:

1. They deny the material allegations.
2. , That they are not guilty.

LYONS, PIPES AND COOK

By Augustine Meaher III
Augustine Meaher, III, Attorney
for Deborah Ann Burkard and
Martin M. Burkard

FILED

FEB 22 1968

ALICE J. BAKER CLERK
REG. ST. CL.