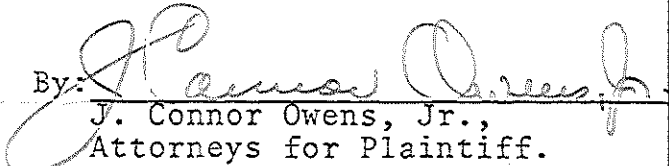


EUGENE BLACK, a minor suing	)	
by and through his father and	)	
next friend, Eddie Black,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
	)	
vs.	)	
	)	
JOYCE J. BOYKIN and GABRIEL	)	AT LAW.
BOYKIN, jointly and individually,	)	72,6374
	)	
Defendants.	)	

The Plaintiff claims of the Defendants, jointly and individually, FIVE THOUSAND AND NO/100 DOLLARS (\$5,000.00) as damages for that heretofore and on, to-wit, June 5, 1968, the Plaintiff was operating a bicycle upon and along U. S. Highway 90, at a point approximately one-half mile West of Malbis Plantation, at which point the said U. S. Highway 90 is a public highway in Baldwin County, Alabama, and at the time and place aforesaid, the Defendant, Joyce J. Boykin, an agent, servant or employee of the Defendant Gabriel Boykin, and while acting within the line and scope of her employment as such, so negligently operated a motor vehicle as to cause or allow the same to collide with the Plaintiff's bicycle, and as a direct and proximate result of the negligence of the Defendants as aforesaid, the Plaintiff sustained the following personal injuries: He was made sick, sore and lame, he received numerous cuts upon his face, head and neck, and he was permanently injured, all for which the Plaintiff sues.

OWENS AND PATTON

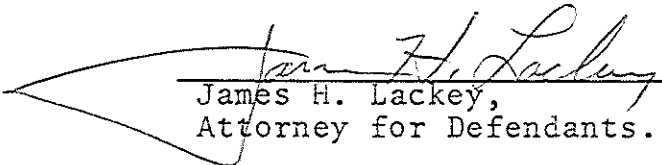
By:   
J. Connor Owens, Jr.,  
Attorneys for Plaintiff.

Service accepted on this the 16th day of October, 1968.

**FILED**

OCT 16 1968

**ALICE J. DUCK** CLERK  
REGISTER

  
James H. Lackey,  
Attorney for Defendants.

ENGENE BLACK, a minor suing  
by and through his father and  
next friend, Eddie Black,

Plaintiff,

vs.

JOYCE J. BOYKIN and GABRIEL  
BOYKIN, jointly and individually,

Defendants.

)

)

)

)

)

)

)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Come now the Defendants in the above styled cause and for  
answer to the Plaintiff's complaint as heretofore filed, sets out  
the following separate and several pleas, separately and severally:

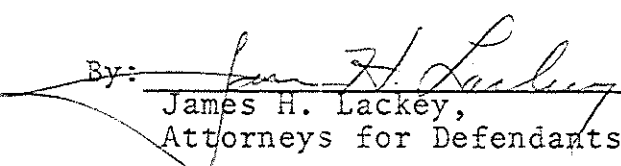
1. Not guilty.

2. The general issue.

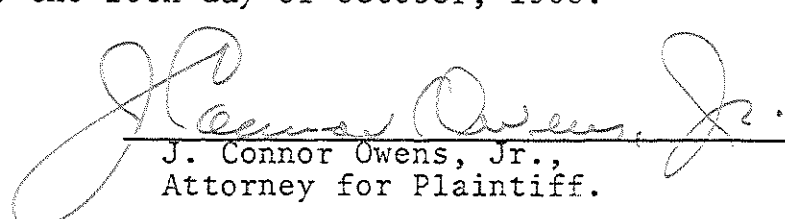
3. The Plaintiff aught not to have and recover of the Defend-  
ants for that at the time and place complained of in the complaint,  
the Plaintiff was guilty of negligence which proximately contribut-  
ed to his own alleged injuries and damages.

COLLINS, GALLOWAY & MURPHY

By:

  
James H. Lackey,  
Attorneys for Defendants.

Service accepted on this the 16th day of October, 1968.

  
J. Connor Owens, Jr.,  
Attorney for Plaintiff.

FILED

OCT 16 1968

ALICE J. BRY

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