

WILLA LYNN ARD, a minor,
by her next friend and father,
EUGENE D. ARD,

Plaintiff,

vs.

RONALD HARMS and DWAIN HARMS,
individually, and d/b/a Harms
Bros. Floor Sanding Company,
a partnership,


Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

85-26

The Plaintiff claims of the Defendants the sum of TWELVE HUNDRED FIFTY AND NO/100 DOLLARS (\$1250.00) for that on, heretofore, to-wit, October 6, 1968, at approximately 9:10 o'clock A. M., the Plaintiff, who is a minor, was a passenger in an automobile being operated by her father, at a point approximately 6 miles East of Robertsedale, Alabama, on a farm to market road in Baldwin County, Alabama, which said road at said point is a public road in Baldwin County, Alabama, and at said time and at said place, the Defendant, Dwain Harms, who was at said time and place an agent, servant or employee of the Defendant, Ronald Harms, and acting within the line and scope of his authority as such, so negligently operated the automobile which he was then and there driving, so as to cause or allow the same to collide with the automobile in which the Plaintiff was riding and as a proximate consequence of the negligence of the Defendant, Dwain Harms, who was then and there an agent, servant or employee of the Defendant, Ronald Harms, and acting within the line and scope of his employment as such, the Plaintiff was injured in this: She received the loss of a permanent front tooth and will require in future times, dental treatment for her other teeth, all to the damage of the Plaintiff, aforesaid, hence this suit.


Attorney for Plaintiff.

I, the undersigned, do hereby accept service of the foregoing.

FILED

JAN 21 1969

ALICE J. DUCK

CLERK
REGISTER


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

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ANSWER:

Now come the Defendants and for answer to the complaint heretofore filed in this cause and state as follows:

1. No guilty.

OWENS AND PATTON

By:

James Owens, Jr.
Attorneys for Defendants.

FILED

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ALICE J. DUCK CLERK
REGISTER