

DAVID HUGH EVANS, a minor
by Hugh L. Evans, natural
guardian and next friend

Plaintiff

vs

CARL XAVIER LIPSCOMB

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

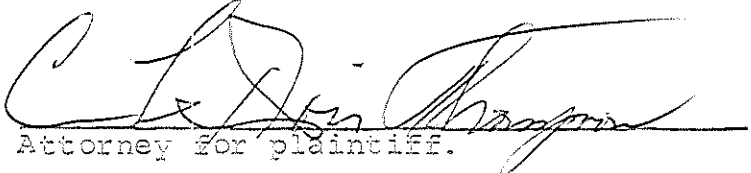
NO. 8257

-1-

The plaintiff claims of the defendant the sum of Twenty-five Thousand (\$25,000.00) Dollars as damages, for that heretofore, on to-wit, the 23rd day of August, 1968, the plaintiff was a passenger in an automobile being operated on a public highway, to-wit, U. S. Highway numbered 90 at or near the entrance of U. S. Highway 98 into U. S. Highway 90 near the community of Spanish Fort, Baldwin County, Alabama, where he had a right to be and defendant, Carl Xavier Lipscomb, so negligently operated his motor vehicle, to-wit, a 1956 Rambler Station Wagon then and there so as to cause said motor vehicle to run over, upon or against the automobile in which your said complainant was a passenger; and plaintiff avers that as a proximate consequence thereof, he was injured severely about the face and neck and was internally injured in that the said plaintiff's kidneys were injured, a portion of one being removed as the result of said injury; and the said injuries to the face and neck resulted in disfiguring scars on the right forehead, cheek, face and mastoid region, as well as the upper eye lid being damaged together with other bruises and contusions; all to his damage in the sum aforesaid; and plaintiff avers that all of his said injuries were proximately caused by the said negligence of the said defendant, Carl Xavier Lipscomb, in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid; and your said plaintiff was forced to expend great sums of money for doctors, hospital services and medicines and has endured great pain and suffering all as the result of said negligence aforesaid.

FILED

JUN 13 1969


Attorney for plaintiff.

CLERK
REGISTER

VOL 62 PAGE 328

E. J. DUCK
ALB

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by Hugh L. Evans, natural
guardian and next friend

Plaintiff

vs

CARL XAVIER LIPSCOMB

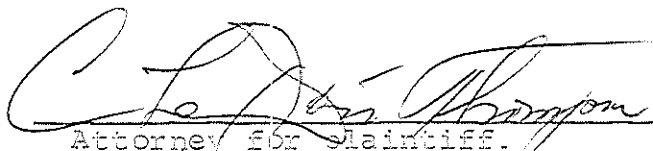
Defendant

X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. _____

Comes plaintiff, David Hugh Evans, a minor by Hugh L. Evans, natural guardian and next friend, in the above styled cause and propounds the following interrogatories to the defendant, Carl Xavier Lipscomb:

1. State your name.
2. State your address.
3. Are you the defendant in the above styled matter?
4. Were you involved in an accident on August 24, 1968, with a 1964 Ford Sedan, Tag No. Ala. 68 2-93127 near Spanish Fort Community on U. S. Highway 90 in Baldwin County?
5. Give the description of the automobile which you were operating including the motor number and tag number.
6. When, where and from whom did you acquire the said automobile?
7. Were you employed at the time of the accident?
8. If so, state the name and address of your employer.
9. Did you have a passenger in the car?
10. If so, give the name and address of the passenger.


Attorney for plaintiff.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am the attorney of record for the plaintiff in the above styled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the defendant to the foregoing interrogatories will, if truthfully made, be material evidence for the plaintiff on the trial of said cause.


C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir
Thompson on this the 13 day of June, 1969.

Aileen McDowell
Notary Public, Baldwin County, Alabama

FILED

JUN 13 1969

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CARL XAVIER LIPSCOMB

~~to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint~~

filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

CARL XAVIER LIPSCOMB....., Defendant.....

by DAVID HUGH EVANS, a minor by Hugh L. Evans, natural guardian

and next friend....., Plaintiff.....

Witness my hand this 13 day of June 1969

Ellice D. Duck Clerk

4-7-11-69

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DAVID HUGH EVANS, a minor by
Hugh L. Evans, natural guardian
and next friend

Plaintiffs

vs.

CARL XAVIER LIPSCOMB

Defendants

1. SUMMONS AND COMPLAINT

~~2. Interrogatories~~

Filed 6-16 1969

Alice D. Week Clerk

C. L. Thompson
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RT 2 Box 190 Daley
RECEIVED
Received in Office

JUN 16 19 19.....

~~TAYLOR WILKINS~~

~~SHERRIFF~~ Sheriff

I have executed this summons

this 7/11 1969

by leaving a copy with

Carl Xavier Lipscomb

Sheriff claims 90 miles at
Ten Cents per mile Total \$ 9.00
BY TAYLOR WILKINS Sheriff
Deputy Sheriff

James W. Tucker Sheriff
Edell Cheum Deputy Sheriff