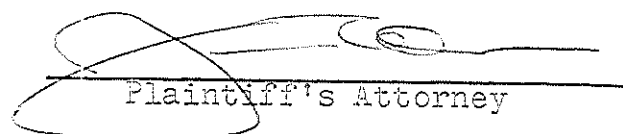


CLINT LARRY TOLBERT,	:	IN THE CIRCUIT COURT OF
a minor, suing by and	:	
through CHARLES A TOLBERT,	:	BALDWIN COUNTY, ALABAMA
as his father and next	:	
friend,	:	AT LAW
	:	
Plaintiff,	:	
VS.	:	CASE NO. <u>8814</u>
J. P. ULRICH,	:	
	:	
Defendant.	:	

COMPLAINT

COUNT ONE

The plaintiff claims of the defendant FIFTEEN HUNDRED (\$1,500.00) DOLLARS for that heretofore on, to-wit, March 22, 1969, at a point three-tenth (0.3) of a mile north of the Joe Yantovitz, Jr., driveway on county road number 91 in Baldwin County, Alabama, the defendant so negligently operated an automobile so as to cause it to run into, upon or against the plaintiff who was then and there at said time and place riding a bicycle at a place where he had a right to be and as a proximate result of the negligence of the defendant the plaintiff suffered ruptured spleen; he was made sick, sore and nervous and was caused to spend money for hospital and doctor bills all to his damage as aforesaid hence this suit.

  
 Plaintiff's Attorney

**FILED**

JUL 24 1969

ALBEE J. DUCK  
 CLERK  
 REGISTER

CLINT LARRY TOLBERT,  
a minor, suing by and  
through CHARLES A. TOLBERT,  
as his father and next  
friend,

Plaintiff,

VS.

J. P. ULRICH,

Defendant.

: IN THE CIRCUIT COURT OF  
:  
: BALDWIN COUNTY, ALABAMA  
:  
: AT LAW

:

:

CASE NO. \_\_\_\_\_

:

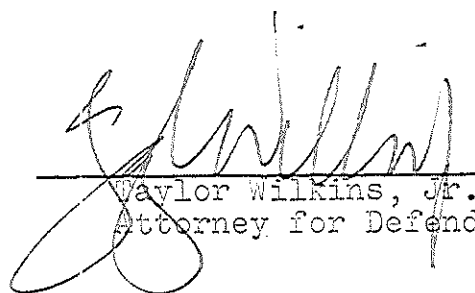
:

PLEA

Comes now the defendant, J. P. Ulrich, separately and severally, and without waiving the demurrer heretofore filed to the plaintiff's complaint, files this plea to the plaintiff's complaint and each count thereof separately and severally:

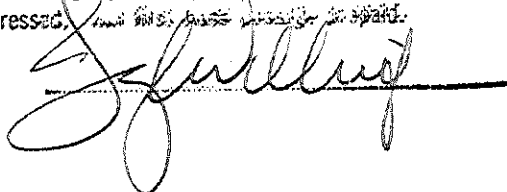
I

The defendant denies each and every allegation of the plaintiff's complaint and each count thereof and demands strict proof of the same.

  
Waylor Wilkins, Jr.  
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on the 22 day of July, 1969, served a copy of the foregoing petition on each of all parties to this proceeding by mailing the same by United States Mail, properly addressed, to the last known address of each.



FILED

JUL 22 1969

ALICE J. DUCK

CLERK  
REGISTER

CLINT LARRY TOLBERT,  
a minor, suing by and  
through CHARLES R.  
TOLBERT, as his father  
and next friend,

PLAINTIFF,

VS.

J. P. ULRICH,

DEFENDANT.

: IN THE CIRCUIT COURT OF  
:  
: BALDWIN COUNTY, ALABAMA  
:

: AT LAW

:

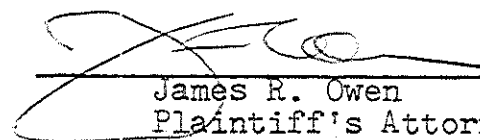
:

: CASE NO: \_\_\_\_\_

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendant SEVENTEEN HUNDRED and NO/100 (\$1,700.00) DOLLARS for that heretofore on, to-wit, March 22, 1969, at a point three-tenth (0.3) of a mile north of the Joe Yantovitz, Jr., driveway on county road number 91 in Baldwin County, Alabama, the defendant so negligently operated an automobile so as to cause it to run into, upon or against the plaintiff who was then and there at said time and place riding a bicycle at a place where he had a right to be and as a proximate result of the negligence of the defendant the plaintiff suffered ruptured spleen; he was made sick, dore and nervous and was caused to spend money for hospital and doctor bills all to his damage as aforesaid hence this suit.

  
James R. Owen  
Plaintiff's Attorney

FILED

OCT 1 1969

ALICE J. DUCK

CLERK  
REGISTER