

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Percy Yelling to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Carl E. Odom, a minor, suing herein by Eleanor Odom, as his guardian, and by Wilbert Odom as his Father and next friend.

Witness my hand this 7 day of <sup>Aug.</sup>~~July~~, 1969.

Alvie J. Duck  
Clerk

CARL E. ODOM, a minor,  
suing herein by ELEANOR  
ODOM, as his Guardian,  
and by WILBERT ODOM, as  
his Father and next  
friend,

Plaintiff,

vs.

PERCY YELLING,

Defendant.

X  
X  
X  
X  
X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO: 8837

The Plaintiff, a minor suing by his guardian and his Father and next friend, claims of the Defendant the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore, on, to-wit: January 12, 1969, while Plaintiff was in the house of Zola Mae Rigsby on East Michigan Avenue in the Town of Foley, Baldwin County, Alabama, the Defendant, Percy Yelling, so negligently

operated an automobile as to cause the same to run over, against and upon the Plaintiff and as a proximate result and consequence of said negligence of the Defendant, the Plaintiff suffered grievous personal injuries in that, to-wit: he suffered severe lacerations of the right thigh; he suffered a complete compound fracture of the right thigh; both of his legs were fractured between the ankle and the knee, he suffered a severe abdominal contusion; he was made to undergo several skin graft operations; he suffered and continues to suffer great physical and mental pain and anguish; he was confined to a hospital and remained there several weeks, and as a further consequence and result of the negligence of the Defendant as aforesaid, Wilbert Odom as Father and next friend was caused to expend large amounts of money for medical and doctor bills and lost the services of said minor; hence this suit.

CHASON, STONE & CHASON

By: 

FILED

AUG 7 1969

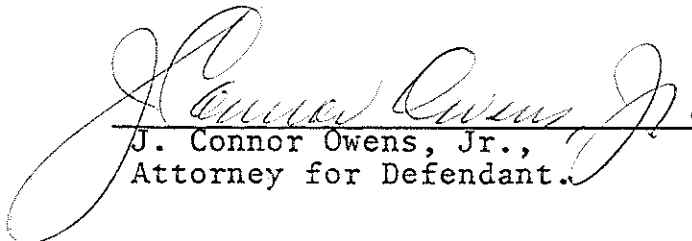
ALICE J. DUCK

CLERK  
REGISTER

CARL E. ODOM, a minor,	)	
sueing herein by ELEANOR	)	
ODOM, as his Guardian,	)	IN THE CIRCUIT COURT OF
and by WILBERT ODOM, as his	)	
Father and next friend,	)	BALDWIN COUNTY, ALABAMA
Plaintiff,	)	
vs.	)	AT LAW.
PERCY YELLING,	)	
Defendant.	)	

Now comes the Defendant in the above styled cause, by and through his attorney, and for answer to the complaint heretofore filed against him, says as follows:

1. Not guilty.
2. The allegations of the complaint are untrue.

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

FILED

AUG 7 1969

ALICE J. DUCK CLERK  
 REGISTER