

MARGUERITE LONG, A MINOR, SUIING  
BY HER MOTHER AND NEXT FRIEND,  
DAISY LONG,

Plaintiff,

VS.

ALABAMA WATER SERVICE COMPANY AND  
J. M. GODWIN,

Defendants.

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA

At Law #

Plaintiff claims of the defendants the sum of \$75<sup>00</sup>  
for that heretofore on towit September 4, 1938, the plaintiff, a  
minor of 16 years of age, whose father is dead and who is  
residing with her mother, Daisy Long, was an occupant of an  
automobile driven by one J. S. Ford, which said automobile was be-  
ing driven in an easterly direction on the highway between Mobile  
and Bay Minette, Alabama, at a point approximately three miles  
East of the East end of Cochran Bridge, which said point is in  
Baldwin County, Alabama and said road being a public highway in  
Baldwin County, Alabama; at which said time and place said auto-  
mobile was run into, upon or against by an automobile, the proper-  
ty of the defendant, Alabama Water Service Company, which was negligently  
being driven by J. M. Godwin, an officer, agent or employee of  
the Defendant Alabama Water Service Company, at which time and  
place the said Godwin was acting within the line and scope of  
his said authority as such servant, agent or employee, and as a  
proximate result of said negligence of the defendants the plain-  
tiff was severely bruised, lacerated and shocked, and received a  
laceration on her face, her right ankle was sprained and other-  
wise injured; her teeth were dislocated and knocked out and her  
right eye was bruised, all of said injuries being of a permanent  
nature.

WHEREFORE plaintiff sues.

*Hylard & Thomas*  
*R. A. Thomas*  
ATTORNEYS FOR THE PLAINTIFF.

MAILED

after the first meeting of the committee on the 1st of January 1938

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Filed Oct. 1, 1938  
R. S. DUCK  
clerk, - register  
By *Charles H. Henshaw*  
Deputy

Complaint

RECORDED  
8-278-  
Duck

LYONS, CHAMBERLAIN & COURTNEY  
ATTORNEYS AT LAW  
517-22 FIRST NATIONAL BANK BUILDING  
MOBILE, ALA.

JOSEPH H. LYONS  
BART S. CHAMBERLAIN  
JOHN P. COURTNEY  
DANIEL H. THOMAS  
BART S. CHAMBERLAIN, JR.

September 30, 1938

Honorable Francis Hare,  
Circuit Judge,  
Bay Minette, Alabama.

In Re: Marguerite Long, a minor, suing  
by her Mother and next friend,  
Daisy Long vs. Alabama Water  
Service Co. and J. M. Godwin - In  
the Circuit Court of Baldwin  
County, Alabama.

Dear Judge Hare:

In the above matter Marguerite Long, a seventeen year old girl whose father is dead, was slightly injured in an automobile wreck which happened on September 4. We represent the Alabama Water Service Company and J. M. Godwin. Godwin was driving the car that was owned by Alabama Water Service Company. Messrs. Hybart and Chason represent the Plaintiff.

In order to settle the matter we have agreed to pay the Plaintiff seventy-five dollars, the court costs, doctors bills, and infirmity fee of five dollars. In view of the fact that Marguerite Long's father is dead her mother is her next friend and we have requested her attorneys to file suit in your court and to take a judgment for seventy-five dollars. We have consented for this judgment to be entered and this letter is for the purpose of giving you this information. When Messrs. Hybart and Chason ask for such judgment by consent we hope that you will enter it and we will then settle the matter at once.

Yours very truly,

*Lyons and Chamberlain*  
Lyons and Chamberlain

CERTIFICATE OF JUDGMENT

The State of Alabama, }  
Baldwin County

Circuit Court, October Term, 19 38

MARGUERITE LONG, a Minor, by her Mother

and Next Friend, Daisy Long,

PLAINTIFF.

Vs.

ALABAMA WATER SERVICE COMPANY, and

J. M. Godwin,

DEFENDANT.

I, R. S. DUCK, Clerk of the Circuit Court of Baldwin County,

Alabama, do hereby certify that on the 3rd day of October 19 38,

a Judgment was rendered by said Court in the above stated cause, wherein

MARGUERITE LONG, a Minor, by her Mother and next friend,  
Daisy Long,

was Plaintiff and ALABAMA WATER SERVICE COMPANY and J. M. Godwin ,

was Defendant, in

favor of the said Plaintiff and against the said Defendant for the sum of

SEVENTY-FIVE & NO/100 (\$75.00) DOLLARS,

and for the sum of SEVEN & 70/100 (\$7.00) DOLLARS,

the costs in said suit and that HYBART & CHASON,

are the Attorneys of record for the Plaintiff  
in said cause.

Witness my hand this 10th day of October, 19 38

By:

Clerk, Circuit Court, Baldwin County, Alabama.  
Deputy-Clerk.

CERTIFICATE OF JUDGMENT

MARGUERITE LONG, a Minor by  
her mother and next friendly  
Daisy Long, Plaintiff

Vs.

ALABAMA WATER SERVICE COMPANY,  
& J. M. Godwin,

Defendant

MOORE PRINTING CO., BAY MINETTE, ALA.

MARGUERITE LONG, A MINOR, SUING  
BY HER MOTHER AND NEXT FRIEND,  
DAISY LONG,

Plaintiff,

VS.

ALABAMA WATER SERVICE COMPANY AND  
J. M. GODWIN,

Defendants.

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:  
: IN THE CIRCUIT COURT

:  
: OF BALDWIN COUNTY,

:  
: ALABAMA

:  
: AT LAW #

Comes the defendants in the above entitled cause  
and for answer to plaintiff's complaint sets out separately and  
severally the following pleas:-

1. Not guilty.
2. In short by consent the general issue.
3. Not guilty of the matters and things alleged in  
said complaint.

*Louis A. Thompson*  
ATTORNEYS FOR DEFENDANTS

RECORDED

*Recd*  
S-276

Answer

*Filed Oct. 1, 1938*

R. G. DUCK

clerk, requires

By *Maudie Thompson*  
Deputy