

472

DOROTHY OGLESBY, a Minor, SUING
BY HER FATHER AND NEXT FRIEND,

George T. OGLESBY,

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 \$ 75⁰⁰

for that heretofore on or about September 4, 1958, the plaintiff, a minor of 17 years of age, was an occupant of an automobile driven by one J. S. Ford, which said automobile was being 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 automobile was run into, upon or against by an automobile, the property 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 defendant the plaintiff was severely bruised, lacerated and shocked and received lacerations about her face, contusions, bruises and sprains about her arms and legs, all of said injuries being of a permanent nature.

WHEREFORE plaintiff sues.

Joyce L. Reason
ATTORNEYS FOR THE PLAINTIFF.

Duck

RECORDED

8-296

Bamblanc

July 1935
R. S. DUCK
clerk, register

By Middle Chamberlain
Duck

CERTIFICATE OF JUDGMENT

The State of Alabama,
Baldwin County,

Circuit Court, October Term, 19 38

DOROTHY OGLESBY, a minor by her father

and Next Friend, Geo. C. Oglesby,

PLAINTIFF.

Vs.

ALABAMA WATER SERVICE COMPANY, and

J. M. Godwin,

DEFENDANT.

R. S. DUCK,

I, 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

DOROTHY OGLESBY, a minor by her father and next friend, Geo. C. Oglesby,

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.

SEVEN & 70/100 (\$7.70) DOLLARS,

and for the sum of

HYBART & CHASON,

the costs in said suit and that

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

DOROTHY OGLESBY, a Minor.

by her father and next friend,
Plaintiff

GEO. F. Ogleby,

Vs.

ALABAMA WATER SERVICE CO., &

J. M. Godwin

Defendant

MOORE PRINTING CO., GAY MINSTER, ALA.

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

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

September 30, 1958

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

In Re: Dorothy Oglesby, a minor, suing
by her Father and next friend,
George F. Oglesby vs. Alabama
Water Service Co. and J. M.
Godwin - In the Circuit Court
of Baldwin County, Alabama.

Dear Judge Hare:

This young lady was also a passenger in the automobile which was in the collision referred to in the attached letter. She was slightly injured on her right elbow. She has entirely recovered according to my information and I have agreed with her, her attorneys, and her father to pay her seventy-five dollars, plus court costs, and doctors bills. I have requested Messrs. Hybart and Chason, Plaintiff's attorneys, to take a judgment by consent for this amount and I will ask that you please enter the order when they request it.

Yours truly,

Bart B. Chamberlain

Bart B. Chamberlain

DOROTHY OGLESBY, a Minor, SUING
BY HER FATHER AND NEXT FRIEND,

George J. Ogleby,

Plaintiff,

vs.

ALABAMA WATER SERVICE COMPANY
AND J. M. GODWIN,

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA.

AT LAW #

DEFENDANTS

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.

Lyon & Lee
ATTORNEYS FOR DEFENDANTS.

Sued
RECORDED
8 - 276

Answer.

2nd Oct. 1/13 35
R. S. DUCK
clerk, register
By Wardell Cheyenne
Deputy