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THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

WE COMMAND YOU, that you summon E. D. Middleton, to be and appear before the Judge of the Circuit Court of Baldwin County, ~~exercising chancery jurisdiction~~ within thirty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint lately exhibited by J. T. Faircloth, Jr., against the said E. D. Middleton, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Defendant shall in no wise omit, under penalty of the law. And we further command that you return this writ with your execution thereof.

WITNESS, R. S. Duck, ~~Register~~ <sup>Clerk</sup> of said Court, this 9<sup>th</sup> day of May, 1946.

R. S. Duck  
Register ~~Clerk~~

J. T. FAIRCLOTH, JR. BY  
J. T. FAIRCLOTH, SR., HIS NEXT  
FRIEND,  
Plaintiff

vs.

E. D. MIDDLETON,  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN LAW.

COMPLAINT

The Plaintiff, an infant, suing by his next friend claims of the Defendant the sum of SEVENTY FIVE & 00/100 DOLLARS (\$75.00) as damages for this: That heretofore, and on to wit: February 2, 1946, the Plaintiff was riding in an automobile of his father, J. T. Faircloth, Sr., his next friend, when Defendant, his agent, servant or employee, while acting within the scope of his employment, so negligently drove and propelled a truck owned by said Defendant as to run into or against and to collide with the car driven by the said J. T. Faircloth, Sr., in which the said Plaintiff was riding at the invitation and request of his father, the said J. T. Faircloth, Sr., at an intersection on Bay Bridge Road at Old U. S. 90 Highway in the City of Mobile, Alabama, where he had a right to be. Plaintiff alleges that as a result of said collision he was bruised about the face and body and was otherwise injured. Plaintiff alleges that his injuries were proximately caused by the negligence of the Defendant, his agent, servant or employee, all to his damage as aforesaid.

For All Clerk H. W. F.  
Forest A. Christian, Foley, Alabama  
Attorney for Plaintiff

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COMPLAINT

J. T. FAIROLOTH, JR. BY HIS  
NEXT FRIEND

VS.

E. D. MIDDLETON

R. S. DUCK, CLERK

MAY 9 1946

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R. S. DUCK, CLERK

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FOREST A. CHRISTIAN  
ATTORNEY AT LAW  
FOLEY, ALABAMA

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Plaintiff

vs.

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Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

PLEA

Now comes the Defendant and for the plea to the  
Complaint says:

1. Not Guilty.

J. B. Blackburn  
Attorney for Defendant

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PLEA

J. T. FAIRCLOTH, JR. BY  
J. T. FAIRCLOTH, SR., HIS NEXT  
FRIEND,  
Plaintiff

vs.

E. D. MIDDLETON,  
Defendant

IN THE CIRCUIT COURT OF  
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R. S. BUCH, CLERK

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