

BERTIE DIEHL, a minor, by
JOHN M. DIEHL, her father and
next friend,

PLAINTIFF,

-VS-

ALLAN P. COVY,

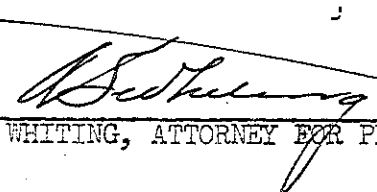
DEFENDANT.

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

COUNT ONE.

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The Plaintiff, a minor, under the age of 14 years, suing by her next friend, claims of the Defendant the sum of Two Hundred and Fifty Dollars (\$250.00) damages for that heretofore and on to-wit: May 1st., 1948, the plaintiff was riding in the automobile of the Defendant, at the invitation of and by the request of the Defendant, when Defendant so negligently drove and propelled said car as to run into or against a motor vehicle, driven by a person whose name is to the Plaintiff unknown; that said collision occurred upon a public highway of Baldwin County, Alabama, at a point or place upon said highway a short distance westwardly from Spanish Fort in Baldwin County, Alabama. Plaintiff alleges that she was violently thrown in and about the interior of said car of the Defendant, and she was thereby caused to be bruised, in and about her body, was caused to bleed profusely, she was caused to suffer from nervous shock, and she was otherwise injured and suffered pain and agony both physical and mental. She was caused to incur expense in and about the treatment of her said injuries. Plaintiff alleges that her injuries were proximately caused by the negligence of the Defendant, all to her damage aforesaid.


A. S. WHITING, ATTORNEY FOR PLAINTIFF.

V. S. WHITING, ATTORNEY FOR PLAINTIFF.

all to her damage aforesaid.

leges that her injuries were proximately caused by the negligence of the Defendant to incur expense in and about the treatment of her said injuries. Plaintiff alleges that she was injured and suffered pain and agony both physical and mental. She was caused pained profoundly, she was caused to suffer from nervous shock, and she was otherwise and she was thereby caused to be bruised in and about her body, was caused to she was violently thrown in and about the interior of said car of the Defendant, westwardly from Spanish Fort in Baldwin County, Alabama. Plaintiff alleges that Baldwin County, Alabama, at a point or place upon said highway a short distance to the Plaintiff unknown; that said collision occurred upon a public highway, of car as to run into or against a motor vehicle, driven by a person whose name is request of the Defendant, when Defendant so negligently drove and proceeded, was riding in the automobile of the Defendant, at the invitation of and (\$250.00) damages for that heretofore and on to-wit: New York, 1918, the Plaintiff next friend, claims of the Defendant the sum of two hundred and fifty Dollars

The Plaintiff, a minor, under the age of 17 years, suing by her

COUNT ONE.

DEFENDANT.

WILLIAM B. COLE.

-42-

PLAINTIFF.

next friend,
JOHN W. DIBBT, her father and
ERBERT DIBBT, a minor, by

COURT, ALABAMA. AT LAW.

IN THE CIRCUIT COURT OF EVIDENCE.

APR 1949
CLERK

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BERTIE DIEHL, a minor, by
JOHN M. DIEHL, her father and)
next friend, PLAINTIFF)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

VS.)

A. P. COVY, DEFENDANT.)

Comes the defendant in the above entitled cause
and for answer to plaintiff's complaint sets out the following
separate and several pleas:

1. Not guilty.
2. The general issue.
3. Not guilty of the matters and things alleged in
plaintiff's complaint.

James Thomas & Pyles
Attorneys for the Defendant.

no 13 34

FILED
APR 11 1949
ALICE J. DUCK, Clerk