

KENNETH LECHNER, a minor, ) IN THE CIRCUIT COURT OF  
suing by his father and next )  
friend, Ed Lechner, ) BALDWIN COUNTY, ALABAMA.  
Plaintiff )  
vs. )  
ROBERT M. COCHRAN, )  
Defendant. ) AT LAW NO.

Comes now the defendant by and through his legally appointed guardian ad litem and for answer to plaintiff's complaint, sets down and assigns the following plea:

1. Not guilty.

  
As Guardian ad Litem for  
Robert M. Cochran.

FILED  
MAY 25 1949  
ALICE J. DUCK, Clerk

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ROBERT M. COCHRAN to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place for holding same, then and there to answer the Complaint of KENNETH LECHNER, a minor, suing by his father and next friend, Ed Lechner.

WITNESS my hand this the 25<sup>th</sup> day of May, 1949.

*W. J. Lechner*  
Clerk of the Circuit Court.

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COMPLAINT

KENNETH LECHNER, a minor, suing  
by his father and next friend,  
Ed Lechner,

Plaintiff,

VS.

ROBERT M. COCHRAN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

The Plaintiff, Kenneth Lechner, a minor, suing by his father and next friend, Ed Lechner, claims of the Defendant Five Hundred Dollars (\$500.00) as damages for that on, to-wit, June 13, 1948 the Plaintiff was riding in an automobile of the Defendant at the intersection of the Silverhill Highway with the highway leading from Fairhope to Mobile in the Town of Fairhope, Alabama and then and there the Defendant wilfully or wantonly drove his said automobile off of the road and wilfully and wantonly injured the Plaintiff, who, as a proximate consequence and result of the Defendant's said wilful and wanton negligence, received a fracture of the shoulder, one of his teeth was knocked out and he was badly bruised and cut in the accident, for all of which he claims damages as afore-

said, hence this suit.

J. B. Blashen  
Attorney for Plaintiff.

701356. (Original)

SUMMONS AND COMPLAINT

KENNETH LECHNER, a minor, suing  
by his father and next friend, Ed  
Lechner,

Plaintiff,

VS.

ROBERT M. COCHRAN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

J. B. BLACKBURN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

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