

RONNIE DIXON, a minor, by his )  
father and next friend, J. O. )  
DIXON, )

Plaintiff, (

-vs-

B. F. KUCERA, )

Defendant. )

IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1404

The defendant, B. F. Kucera, for answer to the complaint  
and each count thereof, separately and severally saeth:-

1. He is not guilty of the matters alleged therein.



Attorney for Defendant

(((((

A N S W E R

))))))

RONNIE DIXON, a minor, by his  
father and next friend, J. O.  
DIXON,

Plaintiff,

-vs-

B. F. KUCERA,

Defendant.

(((((

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

NO. 1404

))))))

FILED  
CECIL G. CHASON

OCT 19 1950  
ATTORNEY AT LAW  
FOLEY, ALABAMA

Alice J. Duck, Clerk

RONNIE DIXON, a minor, by his  
father and next friend, J. O.  
Dixon,

Plaintiff,

-VS-

B. F. KUCERA,

Defendant.

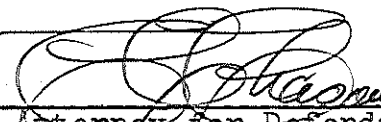
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1404

Comes the defendant in the above styled cause and demurs to  
the complaint filed therein and separately and severally to each  
count thereof and for grounds of demurrer assigns separately and  
severally the following:

1. That said complaint does not state a cause of action.

  
Attorney for Defendant.

D E M U R R E R S

RONNIE DIXON, a minor, by  
his father and next friend,  
J. O. Dixon,

Plaintiff,

--VS--

B. F. KUCERA,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1404

*Filed 10-7-49  
A. L. Smith  
Clerk*

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon B. F. KUCERA

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

B. F. KUCERA

\_\_\_\_\_, Defendant\_\_\_\_\_

by \_\_\_\_\_

RONNIE DIXON

\_\_\_\_\_, Plaintiff\_\_\_\_\_

Witness my hand this 6th day of Sept 1949

Reinhold J. Luecke, Clerk

No. 1404

Page \_\_\_\_\_

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

RONNIE DIXON

Plaintiffs

vs.

B. F. JUCERA

Defendants

SUMMONS and COMPLAINT

Filed Sept 6th, 19 49

Ernest J. Leach Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at \_\_\_\_\_

RECEIVED IN OFFICE

Sept 6, 19 49

Taylor Wilkins Sheriff

I have executed this summons

this 9-8, 19 49  
by leaving a copy with

B. F. Jucera

Taylor Wilkins Sheriff

Edleigh Steadman Deputy Sheriff

RONNIE DIXON, a minor, by his : IN THE CIRCUIT COURT OF  
 father and next friend, J.O. :  
 Dixon, : BALDWIN COUNTY, ALABAMA  
  
 Plaintiff, : AT LAW  
  
 vs. : NO. 1424  
  
 B. F. KUCERA, :  
  
 Defendant. :

### COUNT I

The plaintiff, Ronnie Dixon, a minor of, to-wit, five years of age, by his father and next friend, J.O. Dixon, claims of the defendant, to-wit, Twenty-five Hundred Dollars (\$2,500.00) as damages for that on, to-wit, the 18th day of June, 1949, the defendant wilfully or wantonly drove an automobile which he was operating on and along Alabama Highway No. 3, at or near its intersection with ~~Holer~~ <sup>Hoiles</sup> Street, which said highway at said point is a public highway in the City of Robertsedale, County of Baldwin, State of Alabama, and which said street at said point is a public street in said City of Robertsedale, County of Baldwin, State of Alabama, into, upon, over, or against an automobile in which the plaintiff was riding at said time and place, and as a proximate consequence and result of said wilfulness and wantonness of the defendant at said time and place, the plaintiff received severe personal injuries in this, to-wit: he was bruised about his body in his right ribs, he was cut on his body under his left arm; he received abrasions, bruises and cuts on or about his body, and he was otherwise made sick, sore and lame, he suffered great mental anguish and physical pain; for all of which said injuries and damages the plaintiff, Ronnie Dixon, a minor, by his father and next friend, J.O. Dixon, claims damages as aforesaid; hence this suit.

### COUNT II

The plaintiff, Ronnie Dixon, a minor of, to-wit, five years of age, by his father and next friend, J.O. Dixon, claims of the defendant, to-wit, Twenty-five Hundred Dollars (\$2,500.00) as

damages for that on, to-wit, the 18th day of June, 1949, the defendant so negligently drove an automobile which he was operating on and along Alabama Highway No. 43, at or near its intersection with <sup>Wales</sup> ~~Helen~~ Street, which said highway at said point is a public highway in the City of Robertsdale, County of Baldwin, State of Alabama, and which said street at said point is a public street in the City of Robertsdale, County of Baldwin, State of Alabama, as to cause the same to run into, upon, over or against an automobile in which plaintiff was riding at said time and place, and as a proximate consequence and result of such negligence on the part of the defendant at said time and place, the plaintiff received severe personal injuries in this, to-wit: he was bruised about his body in his right ribs, he was cut on his body under his left arm; he received abrasions, bruises and cuts on or about his body, and he was otherwise made sick, sore and lame, he suffered great mental anguish and physical pain; for all of which said injuries and damages the plaintiff, Ronnie Dixon, a minor, by his father and next friend, J.O. Dixon, claims damages as aforesaid; hence this suit.

Defendant's address:  
Silverhill, Alabama

  
Attorney for plaintiff

Alexander Foreman, Jr.  
207 First National Bank Bldg.  
Mobile, Alabama



[illegible]

$\frac{1}{2} \times \frac{1}{2} = \frac{1}{4}$ 
 $\frac{1}{2} \times \frac{1}{4} = \frac{1}{8}$ 
 $\frac{1}{4} \times \frac{1}{4} = \frac{1}{16}$

RONNIE DIXON, )  
Plaintiff, ) IN THE CIRCUIT COURT OF  
VS. ) BALDWIN COUNTY, ALABAMA  
B. F. KUCERA, ) AT LAW NO. 1404  
Defendant. )

ORDER SETTING DATE FOR HEARING CAUSE

The parties to this cause having agreed that this cause be set for hearing at 9:30 A. M. on Tuesday, May 23, 1950, it is hereby Ordered that the said cause be and it is hereby set for hearing at 9:30 A. M. on Tuesday, May 23, 1950.

It is further Ordered that the Clerk of this Court shall furnish the attorneys for the respective parties to this suit a copy of this order.

DONE on this the 27<sup>th</sup> day of April, 1950.

Jellair J. Mashburn, Jr.  
Judge.

ORDER SETTING DATE FOR HEARING  
CAUSE.

RONNIE DIXON,

VS.

Plaintiff,

B. F. KUCERA,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1404

FILED

APR 27 1950

ALICE J. DUCK, Clerk

1404