

1660

BLANCHETTE FINNEY and
BERNARD FINNEY

PLAINTIFFS

VS

LESLIE MITCHELL

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Comes the Defendant and for answer to each and every count in the complaint in said cause says:

As to Count 1 Defendant admits liability in the amount of One Hundred Thirty-five (\$135.00) Dollars as set forth in said demand and agrees to a judgment therefore.

As to Count 2 Defendant admits liability in the amount of Two Hundred Sixty-five (\$265.00) Dollars as set forth in said demand and agrees to a judgment therefore.

Leslie Mitchell
Defendant.

Defendant acknowledges service in this cause this 16th day of May, 1951.

Leslie Mitchell
Defendant.

No 16 40

RECORDED

FILED

MAY 16 1951

ALICE J. DUCK, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LESLEY MITCHELL to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of BLANCHE AND BERNARD FINNEY.

WITNESS my hand, this 16th day of May, 1951.

Archie H. Smith
Register

BLANCHE FINNEY and
BERNARD FINNEY

PLAINTIFFS

VS

LESLEY MITCHELL

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

1.

The plaintiff, Blanche Finney, claims of the defendant One Hundred Thirty-five (\$135.00) Dollars as damages for that on, to-wit, April 25, 1951 on U. S. Numbered Highway 90 about eight and a half (8½) miles Southeast of Robertsedale, Alabama in Baldwin County, the plaintiff, Blanche Finney, was a passenger in an automobile driven East along said highway at said point and then and there said defendant negligently ran another automobile into, upon or against the automobile in which the plaintiff, Blanche Finney, was a passenger, and thereby and as the proximate result and consequence thereof, the plaintiff received severe personal injuries in this, to-wit: fracture of clavicle together with internal injuries, she was bruised and lacerated about the scalp, face and body; she was made sick, sore and lame; she was internally injured; she was permanently injured; she was caused to expend considerable sums for medical treatment, hospital care, nursing and medicines in and about the treatment of her injuries; her clothing and personal effects were damaged and injured; she lost much time from her work; she was rendered permanently less able to work, for all of which she claims damages as aforesaid.

2.

The plaintiff, Bernard Finney, claims of defendant Two Hundred

Sixty-five (\$265.00) Dollars as damages for that on, to-wit, April 25, 1951 on U. S. Numbered Highway 90 about eight and a half (8½) miles Southeast of Robertsdale, Alabama in Baldwin County. The plaintiff, Bernard Finney, was operating his automobile East along said highway at said point and then and there said defendant negligently ran another automobile into, upon or against plaintiff's automobile, and thereby and as the proximate result and consequence thereof, turned said plaintiff's automobile over, damaged the body, frame and running gear so that motor vehicle was a total loss and said damages amounting to the sum of Two Hundred Sixty-five (\$265.00) Dollars. Plaintiff, Bernard Finney, further avers that the injury complained, of is the proximate result of the negligency of the defendant.


Attorney for Plaintiff.

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RECORDED

FILED

MAY 26 1951

ALICE J. DUCK, Clerk

T/5

Lesley Mitchell

3512 Maint. Sdr.

Randolph A.F.B.

Texas