JANE JONES, a minor, by W.A. JONES, her next friend,

Plaintiff

V.

MRS. ALICE GEBHART,

Defendant

(1898)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

Comes the Defendant, Alice Gebhart, and for answer to the complaint filed in the said cause, saith: She is not guilty of the matters alleged therein.

alice Gebhart

JAME JONES, a minor, by W. A. JONES, her next friend,

Plaintiff

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IN THE CIRCUIT SCURT OF BALDWIN COUNTY, ALABAMA

MRS. ALICE GEBHART,

Defendant

IN LAW

AGREED STATEMENT OF TACTS

Now comes the Plaintiff and the Defendant in the above styled cause and agree that the following is a true and correct statement of the facts in the said case:

On March 18, 1952, at approximately 10:00 p.m., George Gebhart, the minor son of Alice Gebhart of Foley, Baldwin County, Alabama, was driving a 1951 Chevrolet Automobile which was the property of the said Alice Gebhart, along Highway 89 enroute from Fensacola, Florida, to Foley, Alabama, and when approximately one (1) mile east of Alberta, Alabama, on said public highway, while traveling approximately fifty (50) miles per hour and while passing a vehicle which was also going west on said highway, he veered to the left off the highway, into a ditch striking a concrete culvert. There was also an automobile approaching along the highway, meeting the car driven by George Gebhart, which was apparently traveling at a high rate of speed. There were five occupants of the car, all of whom were minors, namely, George Gebhart, Jane Jones, Claude Lindssey, Betty Evans, and Douglas Stuart. Jane Jones suffered injuries to her back and a broken arm in the accident. George Gebhart was operating the automobile with the permission of his mather, Alice Eebhart. W. A. Jones, who filed suit as the next friend of Jane Jones, is her father. The said Jane Jones is in the process of recovering from her injuries.

The above being the true and correct statement of the facts in this case, it is hereby agreed upon as such by the parties hereto.

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W. A. Jon's, her next friend

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Plaintiff is attorner

Alice Gebhart, Defendant

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IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN LAW NO. 1898

ANSWER AND

AGREED STATEMENT OF FACTS

JANE JONES, a minor, by W. A. JONES, her next friend

PLAINTIFF

MRS. ALICE GEBHART,

DEFENDANT

JANE JONES, a minor,
by W. A. JONES, her next
friend,

Plaintiff

v.

BA

MRS. ALICE GEBHART.

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO._____

This day came the Plaintiff and his attorney and issue having been joined between the parties, and an agreed statement of facts having been executed and made a part of the proceedings in this cause and the court having duly considered the same,

It is therefore, considered, ordered and adjudged by the Court that the Plaintiff have and recover of the Defendant the sum of Seven hundred dollars (\$700.00) together with the costs herein to be taxed for all of which execution may issue.

Done this 5th day of former 1953.

Selfair A. Madlebury Je.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN LAW NO. *ૹૹ૽ૹૹ૽ઌઌ૽ઌઌ૽ૹૹૹઌઌ૽ઌઌ૽ઌઌઌઌઌઌઌઌઌઌઌઌ*ઌ JUDGMENT ****************** JANE JONES, a minor, by W. A. JONES, her next friend PLAINTIFF MRS. ALICE GEBHART, DEFENDANT ************ FILED CLERK

STATE OF ALABAMA)

IN THE CIRCUIT COURT***IN LAW
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mrs. Alice Gebhart to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said county at the place of holding same, then and there to answer the complaint of Jane Jones, a minor, by W. A. Jones, her next friend.

Witness my hand this 5 th day of Peromon, 1953.

Plaintiff

V.

MRS. ALICE GEBHART.

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

The Plaintiff claims of the Defendant, the sum of Seven Hundred Dollars (\$700.00) damages, for that hereto fore on to-wit: March 18, 1952, at approximately 10:00PM, the said Defendant did own and possess an automobile which she did then and there loan to her minor son, George Gebhart, and did then negligently permit and allow the said George Gebhart to take and drive same for his own personal pleasure and entertainment and for the pleasure and entertainment of such other persons as he might invite and take unto said automobile with him, unaccompanied by the Defendant or by any other adult person, although the Plaintiff avers the said George Gebhart, a minor, was wholly incompetent and unfit to drive said automobile as was well known to the Defendant; that on said day and on said occasion, the said George Gebhart, being so possessed of said automobile and the sole control of its operation, did take and invite into said automobile, among other persons, all minors under the age of twenty-one years, the said Jane Jones, a minor daughter of the plaintiff, under the

age of twenty-one years, for a pleasure ride and thereupon did drive said automobile over certain public roads between the Town of Foley in the State of Alabama and the City of Pensacola in the State of Florida, and did so negligently, carelessly and improperly operate said automobile in the State of Alabama and County of Baldwin on Highway 89, approximately one (1) mile East of the Community of Elberta, that it caused the automobile to veer off the highway into a ditch and strike a concrete culvert and as the proximate result of said Defendant's negligence and the concurring negligence and incomptency of the said George Gebhart, who was fatally injured, the Plaintiff at this time and place suffered injuries bruises to her body, and injuries to her arm and back to the damage of the Plaintiff in the said sum of Seven Hundred Dollars (\$700) as foresaid.

Whereupon the Flaintiff sies.

- Jane Joyle's

By A. Jones, Her next friend

RECORDED

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN LAW NO. 1898

BILL OF COMPLAINT

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JANE JONES, a minor, by W. A. JONES, her hext friend

PLAINTIFF

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MRS. ALICE GEBHART,

DEFENDANT

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J. CONNOR OWENS, JR. ATTORNEY AT LAW BAY MINETTE, ALABAMA

STATE OF ALABAMA BALDWIN COUNTY

I, JANE JONES, and I, W. A. JONES, jointly and severly, hereby acknowledge payment in full accord and satisfaction of the judgment rendered by the Circuit Court of Baldwin County, Alabama, on the day of January, 1953, wherein Jane Jones, by W. A. Jones, her next friend, was the plaintiff and Alice Gebhart was the defendant; said judgment being in the amount of Seven Hundred Dollars (\$700.00).

Witness our hands and seals on this the day of

Jane Jones (LS)

WITNESSES:

RECORDED

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