

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
Alice Gebhart

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

Plaintiff

v.

MRS. ALICE GEBHART,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

AGREED STATEMENT OF FACTS

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 Pensacola, 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 mother, Alice Gebhart. 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.

Jane Jones
Jane Jones

by W. A. Jones
W. A. Jones, her next friend,
plaintiff

J. Conrad Owens, Jr.
Plaintiff's attorney

Alice Gebhart
Alice Gebhart, Defendant

RECORDED

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

V.

MRS. ALICE GEBHART,

DEFENDANT

FILED 1-55 3-3

Alice Gebhart
CLERK

De fendant.

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 January, 1953.

Jeffrey A. Madbury, Jr.
CIRCUIT JUDGE

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

JUDGMENT

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

PLAINTIFF

V.

MRS. ALICE GEBHART,

DEFENDANT

FILED _____

CLERK

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 incompency 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 Plaintiff aies.

Jane Jones
Jane Jones

By W. A. Jones
W. A. Jones, Her next friend

RECORDED

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

BILL OF COMPLAINT

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

PLAINTIFF

V.

MRS. ALICE GEBHART,

DEFENDANT

FILED 1-5-53

David H. Houch
CLERK

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 5th 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 7th day of January, 1953.

Jane Jones (LS)

W. A. Jones (LS)

WITNESSES:

[Signature]

[Signature]

RECORDED

FILED

1-9-53

CLK

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