

BARBARA JO COGGSDELL, A Minor,
By her mother and next friend,
JOSIE COGGSDELL,

PLAINTIFF

VS.

WILLIAM W. JEFFRIES, JR. and
ROBERT ETHERIDGE,
DEFENDANTS.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA.

) AT LAW NO. 1899

Come now William W. Jeffries, Jr. and Robert Etheridge,
separately and severally, and for answer to the plaintiff's
complaint, sets down and assign the following plea separately
and severally:

PLEA ONE

Not guilty.

W. W. Jeffries
R. Etheridge

ATTORNEYS FOR THE DEFENDANTS

1899

RECORDED

Filed 1-8-03
A. J. French
clerk

BARBARA JO COGGSDELL, A Minor,
By her mother and next friend,
JOSIE COGGSDELL,
Plaintiff.

vs.

WILLIAM W. JEFFRIES, JR. and
ROBERT ETHERIDGE,
Defendants.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA.
)

) AT LAW NO. 1499
)
)

COUNT ONE.

Plaintiff claims of the defendants the sum of Four Hundred and no/100 (\$400.00.) Dollars, for damages for that on to-wit the 7th day of December, 1952, the defendant Robert Etheridge who was then and there a servant, agent or employee of the defendant William W. Jeffries, Jr., acting in the line and scope of his authority as such servant, agent or employee, so negligently operated an automobile on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point six tenths of a mile west of the intersection of U. S. Highway 90 and U. S. Highway 31, that the said automobile then and there collided with the plaintiff who was then and there crossing or attempting to cross the said Highway 90, and as a proximate result of said negligence the plaintiff suffered bruises and shock, rupture of the spleen, lacerations of the scalp and lacerations and contusions about the body, and was painfully and permanently injured, all to the plaintiff's damage as aforesaid; WHEREFORE this suit.


ATTORNEY FOR THE PLAINTIFF.

RECORDED

File 1-853
Arling J. French
clerk