

2018

CARL A. DEVINE, A Minor, suing  
by L. L. DEVINE, as his next  
friend,

Plaintiff,

vs.

J. L. NELSON,

Defendant.

IN THE CIRCUIT COURT OF

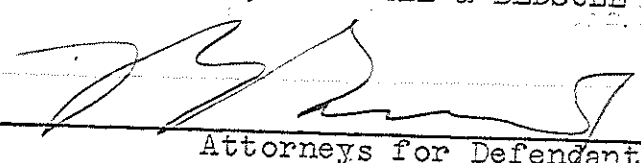
BALDWIN COUNTY, ALABAMA

LAW - SIDE

PLEA

Comes now the Defendant, by his attorneys, and for answer to the complaint saith that he is not guilty of the matters alleged therein.

SMITH, HAND, ARENDALL & BEDSOLE

By:   
Attorneys for Defendant

W 2018  
RECORDED

CARL A. DEVINE, A Minor, suing  
by L. L. DEVINE, as his next  
friend,

Plaintiff,

vs.

J. L. NELSON,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

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PLEA OF GENERAL ISSUE

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FILED

JUN 15 1953

ALICE J. DUCK, Register

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT \* LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon J. L. NELSON to appear within thirty days from the service of this Writ in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of CARL A. DEVINE, a Minor, suing by L. L. DEVINE, as his next friend.

Witness my hand this the 14<sup>th</sup> day of June, 1953.

*Archie French*  
Clerk

COMPLAINT

CARL A. DEVINE, A Minor, suing  
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LAW SIDE

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Two Thousand Four Hundred and No/100 Dollars (\$2,400.00) as damages for that on heretofore, to-wit, the 24th day of September, 1952, Martin L. Nelson, who was then and there a servant or agent of the Defendant J. L. Nelson, while acting within the line and scope of his employment as such, so negligently operated a motor vehicle on Alabama Highway No. 104 at the intersection thereof with the Loxley - Marlow Road in the Town of Silverhill, in Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, upon or against a motor vehicle in which the Plaintiff was then and there riding, and as a proximate result of which negligence the Plaintiff suffered great bodily harm in this: his wrist was severely and permanently injured and disabled and he was caused to lose time from his work

and to suffer pain and anguish, all to the damage of the Plaintiff as aforesaid, wherefore Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

By: Marlene G. Stone  
Attorneys for Plaintiff

702018  
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by L. L. DEVINE, as his next  
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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

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SUMMONS AND COMPLAINT

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FILED

JUN 15 1953

ALICE J. DUCK, Register  
LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA