

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., a minor,
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NUMBER 2025.

ANSWER

.....

I. The defendant in the above styled cause comes now and for answer to
the complaint, saith that he is not guilty of the matters alleged therein.

Wilson Hayes
WILSON HAYES
GUARDIAN AD LITEM

CASE NUMBER 2025

ANSWER: FILED
MARY ALICE BUTTNER
by next friend
ELMO .M. BUTTNER ,
PLAINTIFF
vs.
GEORGE L. WALKER ,
DEFENDANT

FILED
FEB 9 1954
ALICE J. DUCK, Clerk

WILSON HAYES
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

AMENDED SUMMONS AND COMPLAINT

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., a minor,

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. _____.

Comes now the Plaintiff in the above styled cause and amends her
summons and complaint to read as follows:

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons GEORGE L. WALKER, JR., also known
as SNOOKIE WALKER, a minor, 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 MARY ALICE
BUTTENER, a minor, suing by next friend, ELMO M. BUTTENER.

Witness my hand, this _____ day of _____, 1953.

Clerk

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., also
known as SNOOKIE WALKER, a minor,

DEFENDANT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. _____.

COUNT ONE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00)
DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the
Plaintiff was riding a vehicle, which was being driven, in a Southerly
direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90;
a public highway in Baldwin County, Alabama, at a point in Baldwin County,
approximately 1.3 miles North of Robertsdale, Alabama, that at said time
and place the Defendant so negligently operated the vehicle he was driving

as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body; she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend

monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public high way in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsdale, Alabama, and that then and there George L. Walker Jr., also known as Snookie Walker, did wantonly run the vehicle he was driving into the vehicle the Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish; she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is 208 West Maxwell Street, Pensacola, Florida, C/o C. C. Chancellor, and the Plaintiff prays that service of process upon the defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

WILTERS & BRANTLEY

BY:

James M. Brantley
Attorneys for Plaintiff

2025

MARY ALICE BUTTNER, A MINOR
SUIING BY NEXT FRIEND, EIMO M.
BUTTNER,

PLAINTIFF

VS

GEORGE L. WALKER JR., ALSO
KNOWN AS SNOOKIE WALKER, A MINOR

DEFENDANT

AMENDED SUMMONS AND COMPLAINT

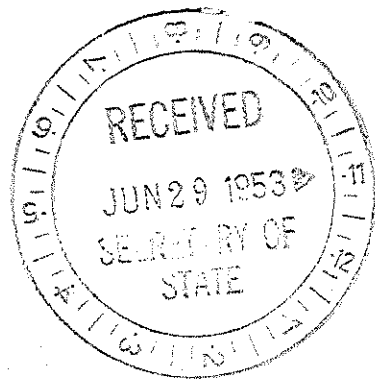
FILED

SEP 9 1953

ALICE J. DUCK, Clerk

WITNESS A CHURCH

Edward W. Wells



SUMMONS AND COMPLAINT

STATE OF ALABAMA §

BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:--

You are hereby commanded to summons GEORGE L. WALKER, JR., a minor, 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 MARY ALICE BUTTNER, a minor, suing by next friend, ELMO M. BUTTNER.

Witness my hand, this 26th day of June, 1953.

Alice J. French
Clerk

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO M.
BUTTNER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. _____

COURT ONE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle, which was being driven, in a Southerly direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, that at said time and place the Defendant so negligently operated the vehicle he was driving as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization;

all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit: April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit: U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsdale, Alabama, and that then and there George L. Walker, Jr., did wantonly run the vehicle he was driving into the vehicle the

Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is Ocean Springs, Mississippi, and the Plaintiff prays that service of process upon the Defendant, George L. Walker, Jr., a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

WILKINS & BRANTLEY

By Albert M. Brantley
Attorneys for Plaintiff

FILED
JUN 20 1953
VIRGIL D. BRANTLEY

CASE NO. 50-50-2

AT LAW

WILKINS & BRANTLEY

IN THE CIRCUIT COURT OF

Defendant

GEORGE L. WALKER, JR., a minor,

vs.

Plaintiff

WILKINS & BRANTLEY
ATTORNEYS FOR PLAINTIFF
VIRGIL D. BRANTLEY, a minor,

SHOULD BE DELETED

50-50-2

NO 2025

SUMMONS AND COMPLAINT

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO M.
BUTTNER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 2025

FILED
JUN 26 1953
ALICE J. DUCK, Clerk

Plaintiff, MARY ALICE BUTTNER, a minor, suing by next friend, ELMO M. BUTTNER, Defendant, GEORGE L. WALKER, JR., a minor.

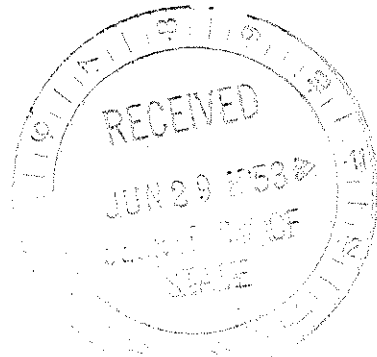
Comes now the Plaintiff, MARY ALICE BUTTNER, a minor, suing by next friend, ELMO M. BUTTNER, and moves the Court for an order compelling the Defendant, GEORGE L. WALKER, JR., a minor, to appear in this Court and answer the Complaint filed herein.

And the Plaintiff moves the Court for an order compelling the Defendant, GEORGE L. WALKER, JR., a minor, to pay the costs of this action.

Wherefore the Plaintiff prays that the Court will grant the foregoing orders and award costs to the Plaintiff.

Subscribed and sworn to before me this 20th day of June, 1953.

Notary Public for Baldwin County, Alabama.



SUMMONS AND COMPLAINT

STATE OF ALABAMA §
BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summons GEORGE L. WALKER, JR., a minor, 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 MARY ALICE BUTTNER, a minor, suing by next friend, ELMO M. BUTTNER.

Witness my hand, this 26th day of June, 1953.

Beice L. Walker
Clerk

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO M.
BUTTNER,
Plaintiff,
VS.
GEORGE L. WALKER, JR., a minor,
Defendant.

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

COUNT ONE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle, which was being driven, in a Southerly direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, that at said time and place the Defendant so negligently operated the vehicle he was driving as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization;

all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit: April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit: U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsdale, Alabama, and that then and there George L. Walker, Jr., did wantonly run the vehicle he was driving into the vehicle the

Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is Ocean Springs, Mississippi, and the Plaintiff prays that service of process upon the Defendant, George L. Walker, Jr., a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

WILKINSON & BRANTLEY

By: Albert M. Brantley
Attorneys for Plaintiff

FILED
JUN 1 1953
JUN 28 1953

OVER NO. 2052.

AT LAW

WILKINSON COUNTY, ALABAMA.

IN THE CIRCUIT COURT OF

Defendant.

GEORGE L. WALKER, JR., a minor,

vs.

Plaintiff.

HILDA WALKER, wife of George L. Walker, Jr., a minor,

CHILD OF GEORGE L. WALKER, JR.

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

VS.

Defendant,

AT LAW

FILED
JUN 26 1953
AIDE J. DUCK, CLERK

AMENDED SUMMONS AND COMPLAINT

MARY ALICE BUTTENER, a minor, Ø
suing by next friend, ELMO M. Ø
BUTTENER, Ø IN THE CIRCUIT COURT OF

 Ø BALDWIN COUNTY, ALABAMA,
 Ø
 Ø AT LAW
VS Ø

GEORGE L. WALKER, JR., a minor, Ø CASE NO. _____.

 Ø
 Ø DEFENDANT

Comes now the Plaintiff in the above styled cause and amends her
summons and complaint to read as follows:

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons GEORGE L. WALKER, JR., also known
as SNOOKIE WALKER, a minor, 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 MARY ALICE
BUTTENER, a minor, suing by next friend, ELMO M. BUTTENER.

Witness my hand, this _____ day of _____, 1953.

Clerk

MARY ALICE BUTTENER, a minor, Ø
suing by next friend, ELMO M. Ø
BUTTENER, Ø IN THE CIRCUIT COURT OF

 Ø BALDWIN COUNTY, ALABAMA,
 Ø
 Ø AT LAW
VS Ø

GEORGE L. WALKER, JR., also Ø CASE NO. _____.
known as SNOOKIE WALKER, a minor, Ø
 Ø
 Ø DEFENDANT

COUNT ONE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00)
DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the
Plaintiff was riding a vehicle, which was being driven, in a Southerly
direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90;
a public highway in Baldwin County, Alabama, at a point in Baldwin County,
approximately 1.3 miles North of Robertsedale, Alabama, that at said time
and place the Defendant so negligently operated the vehicle he was driving

as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body; she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend

monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsedale, Alabama, and that then and there George L. Walker Jr., also known as Snookie Walker, did wantonly run the vehicle he was driving into the vehicle the Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish; she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is 208 West Maxwell Street, Pensacola, Florida, C/o C. C. Chancellor, and the Plaintiff prays that service of process upon the defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

WILTERS & BRANTLEY

BY:

Allen M Brantley
Attorneys for Plaintiff

2025

MARY ALICE BUTTENER, a minor,
SUING BY NEXT FRIEND, ELMO M.
BETTENER,

PLAINTIFF

VS.

GEORGE E. WALKER, JR., ALSO
KNOWN AS SNOOKIE WALKER, A MINOR
DEFENDANT

AMENDED SUMMONS AND COMPLAINT

THE RISE OF THE SUPERHERO

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we're interested in how we can get things done at the local level, rather than a national approach as most people are used to.

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For these reasons, we deem it appropriate to award \$500,000.00 in damages, as related to the \$1,000,000.00.

On November 20, 1944, the following information was received from the Bureau of the Census:

CONFIDENTIAL

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SUMMONS AND COMPLAINT

STATE OF ALABAMA §

BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summons GEORGE L. WALKER, JR., a minor, 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 MARY ALICE BUTTNER, a minor, suing by next friend, ELMO M. BUTTNER.

Witness my hand, this 26th day of June, 1953.

Reuben F. Leach
Clerk

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO M.
BUTTNER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. _____

COUNT ONE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle, which was being driven, in a Southerly direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, that at said time and place the Defendant so negligently operated the vehicle he was driving as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization;

all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit: April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit: U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsdale, Alabama, and that then and there George L. Walker, Jr., did wantonly run the vehicle he was driving into the vehicle the

Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalizations; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., a minor, is and was on the day of said collision, to-wit, April 20, 1950, a resident of the State of Alabama, and that the present post office address of said Defendant is Loose Springs, Mississippi, and the Plaintiff prays that service of process upon the Defendant, George L. Walker, Jr., a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

WITNESSES & VERIFICATION

By: Robert M. Brantley
Attorneys for Plaintiff

CASE NO. 80-5-2

AT LAW

DAVIDSON COUNTY, ALABAMA

IN THE CIRCUIT COURT OF

Defendant

GEORGE L. WALKER, JR., a minor,

vs.

Plaintiff

BUTLER, being by next friend, ERIC M. HARRIS, ALICE BUTLER, a minor,

SINCE AND CONTINUED

FILED
JUL 20 1950
OFFICE OF THE CLERK

SUMMONS AND COMPLAINT

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO M.
BUTTNER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 2025.

FILED
JUN 26 1953
ALICE J. DUCK, Clerk

Edward M. Walker

5-6-53

JUN 26 1953
FILED

SUBPOENS AND COMPLAINT

BOOK 001 PAGE 05

STATE OF ALABAMA §

BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summons GEORGE L. WALKER, JR., a minor, 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 MARY ALICE BUTTNER, a minor, suing by next friend, ELMO M. BUTTNER.

Witness my hand, this 26th day of June, 1953.

Alice Buttner
Clerk

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO M.
BUTTNER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. _____

COUNT ONE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle, which was being driven, in a Southerly direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, that at said time and place the Defendant so negligently operated the vehicle he was driving as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization;

all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsedale, Alabama; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit: April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit: U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsedale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsedale, Alabama, and that then and there George L. Walker, Jr., did wantonly run the vehicle he was driving into the vehicle the

Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is Ocean Springs, Mississippi, and the Plaintiff prays that service of process upon the Defendant, George L. Walker, Jr., a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

FILED

6-26-53

ALICE L. RUCK, Clerk

WILKINS & BRANTLEY

By:

Albert M. Brantley
Attorneys for Plaintiff

79025

SUMMONS AND COMPLAINT

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO M.
BUTTNER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 2025

Received in
this day of June 1953 790
TAYLOR WILKINS, Sheriff

RECEIVED IN OFFICE

JUN 27 1953

G. A. MOSLEY, Sheriff

EXHIBITED BY SERVING
COPY OF THE WITHIN

Agner, Baggett
for - Secy of State
June 29/53

G. A. Mosley
Sheriff Montgomery County

By [Signature]
Deputy Sheriff

FILED
JUN 26 1953
ALICE J. BUCK, Clerk

AMENDED SUMMONS AND COMPLAINT

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., a minor,

DEFENDANT

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

Comes now the Plaintiff in the above styled cause and amends her summons and complaint to read as follows:

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons GEORGE L. WALKER, JR., also known as SNOOKIE WALKER, a minor, 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 MARY ALICE BUTTENER, a minor, suing by next friend, ELMO M. BUTTENER.

Witness my hand, this 9th day of Sept, 1953.

Marie J. Rensch
Clerk

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., also
known as SNOOKIE WALKER, a minor,

DEFENDANT

COUNT ONE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle, which was being driven, in a Southerly direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, approximately 1.3 miles North of Robertsedale, Alabama, that at said time and place the Defendant so negligently operated the vehicle he was driving

as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body; she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend

monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public high way in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsedale, Alabama, and that then and there George L. Walker Jr., also known as Snookie Walker, did wantonly run the vehicle he was driving into the vehicle the Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish; she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is 208 West Maxwell Street, Pensacola, Florida, C/o C. C. Chancellor, and the Plaintiff prays that service of process upon the defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

FILED

9-9-53

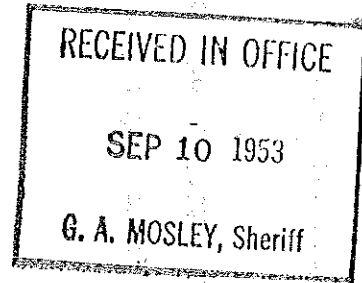
ALICE L. DUCK, Clerk

WILTERS & BRANTLEY

BY:

Charles M. Brantley
Attorneys for Plaintiff

1878
Received in the Office
this 9 day of Sept, 1953
TAYLOR WILKINS, Sheriff



EXECUTED BY SERVING
COPY OF THE WRIT

Agnes, Baggett
the Secy of State

Sept 10/53

G. A. Mosley
Sheriff Montgomery County
By *W. A. Mosley*
Deputy Sheriff

NO 2028

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER JR., also
known as Snookie Walker, a minor

ATTENDED SUMMONS AND COMPLAINT

FILED
SEP 9 1953
ALICE J. DUCK, Clerk

MARY ALICE BUTTENER, A
MINOR, SUING BY NEXT FRIEND
ELMO M. BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER JR.,
ALSO KNOWN AS SNOOKIE
WALKER, A MINOR,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Before me, Alice J. Duck, Clerk of the Circuit Court in and for said County and State, personally appeared Tolbert M. Brantley, who being by me first duly sworn, deposes and says: That George L. Walker Jr., also known as Snookie Walker, is under the age of twenty-one and over the age of Fourteen and the Defendant in the above styled cause; that he was served with a copy of the summons and complaint in this cause on September 29, 1953, and has failed to nominate any one to act as guardian ad litem for him.

Tolbert M Brantley

Sworn to and subscribed before me on this the 22nd day of January, 1954.

FILED

1-22-54

ALICE J. DUCK, Clerk

Desiree J. ...
Clerk of the Circuit Court

2025-

MARY ALICE BUTTENER, A
MINOR, SUING BY NEXT FRIEND,
ELMO M. BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR.,
ALSO KNOWN AS SNOOKIE WALKER,
A MINOR,

DEFENDANT

AFFIDAVIT

~~FILED~~
JAN 22 1954
CLERK

MARY ALICE BUTTENER, A MINOR,
SUIING BY NEXT FRIEND, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., ALSO
KNOWN AS SNOOKIE WALKER, A MINOR,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW

In this cause it is made to appear to the Court by the Affidavit of Tolbert M. Brantley that the Defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, in the belief of the affiant is an infant over the age of fourteen years and it further appearing that a summons and a copy of the Bill of Complaint in this cause was served personally upon the Defendant on the 29th day of September, 1953, and it further appearing that no one has been nominated by the said Defendant to act as Guardian Ad Litem for him; and it further appearing that Wilson Hayes Esq., an Attorney at Law, is, in all respects a suitable person to act as guardian ad Litem for George L. Walker Jr., also known as Snookie Walker, a minor; it is now ordered by the Court, that the said Wilson Hayes be, and he hereby is, appointed Guardian Ad Litem in this cause for the said Defendant.

Dated this the 24 day of January, 1954.

Tolbert M. Brantley
Circuit Judge

ACCEPTANCE

I, Wilson Hayes, hereby accept the above appointment as Guardian Ad Litem, and consent to act as such in the above cause.

Witness my hand this 25th day of January, 1954.

Wilson Hayes
Guardian ad Litem.

FILED

1-22-54
ALICE J. BUCK, Clerk

21 JAN 10 1954

2025

APPOINTMENT OF GUARDIAN
AD LITEM AND ACCEPTANCE

MARY ALICE BUTTENER, A
MINOR, SUING BY NEXT FRIEND
ELMO M. BUTTENER,

COMPLAINANT

VS

GEORGE L. WALKER JR., ALSO
KNOWN AS SNOOKIE WALKER,
A MINOR,

RESPONDENT

FILED
JAN 22 1954
ALICE I. RUCK, Clerk

wherein the said minor is named as plaintiff and the said minor is named as defendant.

WITNESSES

WITNESSES

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., a minor,
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NUMBER _____

ANSWER

I, The defendant in the above styled cause comes now and for answer to
the complaint, saith that he is not guilty of the matters alleged therein.

FILED

2-9-54

ALICE J. DUCK, Clerk

Wilson Hayes
WILSON HAYES
GUARDIAN AD LITEM

CASE NUMBER 2025

ANSWER, FILED

MARY ALICE BUTTENER
by next friend
ELMO M. BUTTENER,
PLAINTIFF

VS.

GEORGE L. WALKER,
DEFENDANT

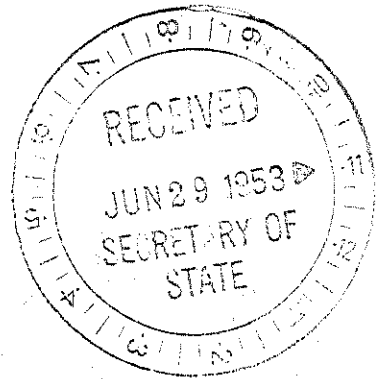
FILED

FEB 9 1954

ALBANY, N. Y.

WILSON HAYES
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT



STATE OF ALABAMA §

BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summons GEORGE L. WALKER, JR., a minor, 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 MARY ALICE BUTTENER, a minor, suing by next friend, ELMO M. BUTTENER.

Witness my hand, this 26th day of June, 1953.

Benjamin F. Walker
Clerk

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. _____

COUNT ONE:

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle, which was being driven, in a Southerly direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, that at said time and place the Defendant so negligently operated the vehicle he was driving as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization;

all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit: April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit: U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR: The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90 approximately 1.3 miles North of Robertsdale, Alabama, and that then and there George L. Walker, Jr., did wantonly run the vehicle he was driving into the vehicle the

Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is Ocean Springs, Mississippi, and the Plaintiff prays that service of process upon the Defendant, George L. Walker, Jr., a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

WILTERS & BRANTLEY

By:

Albert M Brantley
Attorneys for Plaintiff

no 2025

SUMMONS AND COMPLAINT

MARY ALICE BUTTNER, a minor,
suing by next friend, ELMO H.
BUTTNER,

Plaintiff,

VS.

GEORGE L. WALKER, JR., a minor,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

CASE NO. 2025.

FILED

JUN 26 1953

ALICE J. DUCK, Clerk

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this Card.

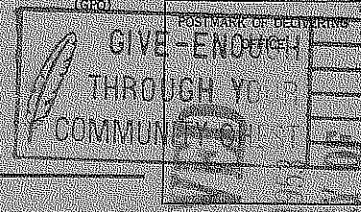
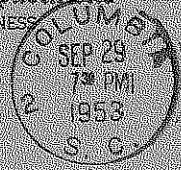
1 George Lee Walberg
(Signature or name of addressee)

2 DELIVER TO ADDRESSEE ONLY
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery SEP 29 1953, 1953

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300
(GPO)



Return to Secretary of State

Street and Number, or Post Office Box, (NAME OF SENDER)
Montgomery, Alabama

REGISTERED ARTICLE

No. 103
INSURED PARCEL

MONTGOMERY,
ALABAMA.



MRS. AGNES BAGGETT
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY 4. ALABAMA

July 31, 1953

The Honorable
Mrs. Alice J. Duck
Clerk, Circuit Court of
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Upon advice from the Honorable Tolbert M. Brantley
I am returning to you herewith copies of summons and complaint
in the cases of:

Mary Alice Buttener, et al vs George L. Walker, Sr. and Jr.

which cases I was unable to complete service on due to report
by postal authorities that the defendants, George L. Walker, Sr.
and George L. Walker, Jr. had moved and left no address.

Sincerely yours,

Mrs. Agnes Baggett
Secretary of State

cc: Hon. Tolbert M. Brantley
Wilters & Brantley
Bay Minette, Alabama



MRS. AGNES BAGGETT
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY 4, ALABAMA

July 15, 1953

Hon. Tolbert M. Brantley
Wilters & Brantley, Attorneys
Bay Minette, Alabama

Re: Mary Alice Buttener, et al
vs

- 1) George L. Walker, Sr., et al
- 2) George L. Walker, Jr., et al

Dear Mr. Brantley:

Please refer to your file in the above-styled causes
and be advised as follows:

On June 29, 1953 I sent by registered mail, return receipt
requested, deliver to addressee only, my notice together with
copy of summons and complaint to George L. Walker, Sr., (Father
of George L. Walker, Jr., a Minor) and to George L. Walker, Jr.,
a Minor, each at Ocean Springs, Mississippi.

Today (July 15, 1953) these letters (registry Nos. 52101
and 52102, respectively) have been returned to me with reason
for non-delivery given: "Moved, Left no address."

Please advise me what further disposition to make of
this file.

Sincerely yours,

Mrs. Agnes Baggett
Mrs. Agnes Baggett
Secretary of State

cc: Mrs. Alice J. Duck
Clerk, Circuit Court
of Baldwin County
Bay Minette, Alabama

IN THE CIRCUIT COURT

Mary Alice Buttener, a minor suing by her next
friend, Elmo M. Buttener, Plaintiff

of

BALDWIN COUNTY, ALABAMA

vs

George L. Walker, Jr., a minor
also known as Snookie Walker

AT LAW No. -

TO THE CIRCUIT COURT OD BALDWIN COUNTY, ALABAMA, AT LAW:

I, Agnes Baggett, Secretary of State, hereby certify that on September 10, 1953,
I sent by registered mail in an envelope addressed as follows:

" George L. Walker, Jr.,
Also known as Snookie Walker, a Minor
208 West Maxwell Street
Pensacola, Florida
c/o C. C. Chancellor"

"Registered mail
Return Receipt Requested
Deliver to Addressee only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the
Great Seal of the State of Alabama in words and figures as follows:

" George L. Walker, Jr.,
Also known as Snookie Walker, a Minor
208 West Maxwell Street
Pensacola, Florida
c/o C. C. Chancellor

You will take notice that on September 10, 1953 the Sheriff of
Montgomery County, Alabama served upon me, in my official capacity,
summons and complaint in a case entitled Mary Alice Buttener, a minor, suing
by her next friend, Elmo M. Buttener, Plaintiff vs George L. Walker, Jr.,
a Minor,
Defendant, in the Circuit Court of Baldwin County, Alabama, at Law
~~County, Alabama~~, Case No. -, a true copy of which summons and
complaint is attached hereto and the said service upon me as Secretary of
State of the State of Alabama has the force and effect of personal service
upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the
10 day of September, 1953.

Signed) Agnes Baggett

Mrs. Agnes Baggett
Secretary of State "

Enclosures - 1

I further certify that the notice above set out which was so mailed in the
envelope addressed as above set forth had attached to it a true copy of the summons
and complaint in the above-styled cause.

I further certify that on September 30, 1953, I received the return card,
showing receipt by the designated addressee of the aforementioned matter, at

Columbia, S. C.

on September 29, 1953.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 30 day
of September, 1953.

Mrs Agnes Baggett
Mrs. Agnes Baggett
Secretary of State

Enclosures - (Return card
and copy of summons and
complaint)

AMENDED SUMMONS AND COMPLAINT

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., a minor,

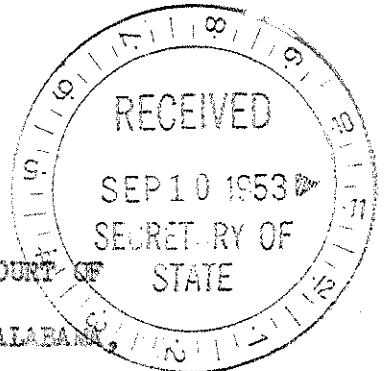
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. _____.



Comes now the Plaintiff in the above styled cause and amends her
summons and complaint to read as follows:

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons GEORGE L. WALKER, JR., also known
as SNOOKIE WALKER, a minor, 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 MARY ALICE
BUTTENER, a minor, suing by next friend, ELMO M. BUTTENER.

Witness my hand, this 9th day of Sept, 1953.

W. J. J. J. J.
Clerk

MARY ALICE BUTTENER, a minor,
suing by next friend, ELMO M.
BUTTENER,

PLAINTIFF

VS

GEORGE L. WALKER, JR., also
known as SNOOKIE WALKER, a minor,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

CASE NO. _____.

COUNT ONE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00)
DOLLARS as damages for that heretofore on, to-wit, April 20, 1953, the
Plaintiff was riding a vehicle, which was being driven, in a Southerly
direction, by Virgil Lee Blackman, along and upon U. S. Highway Number 90;
a public highway in Baldwin County, Alabama, at a point in Baldwin County,
approximately 1.3 miles North of Robertsedale, Alabama, that at said time
and place the Defendant so negligently operated the vehicle he was driving

as to cause it to run into or against the vehicle the Plaintiff was riding and as a direct, proximate consequence and result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body; she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT TWO

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages for that heretofore, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along Highway Number 90, a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale; that at said time and place the Defendant, so negligently operated the vehicle which he was driving along said Highway at said time and place so as to cause it to run into or collide with the vehicle the Plaintiff was riding and as a proximate result of said negligence the Plaintiff was negligently injured as follows: Her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT THREE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore on, to-wit, April 20, 1953, the Plaintiff was riding along and upon a public Highway in Baldwin County, a place where she had a right to be, to-wit, U. S. Highway Number 90; a public highway in Baldwin County, Alabama, at a point in Baldwin County, Alabama, approximately 1.3 miles North of Robertsdale, Alabama, and that then and there the Defendant negligently did run the vehicle he was driving into the vehicle the Plaintiff was riding and as a direct proximate consequence and result of said negligence the Plaintiff was negligently injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish, she was caused to expend

Monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

COUNT FOUR

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS as damages, for that heretofore, on, to-wit, April 20, 1953, the Plaintiff was riding a vehicle along and upon a public high way in Baldwin County, a place where she had a right to be, to-wit, U. S.

Highway Number 90 approximately 1.3 miles North of Robertsedale, Alabama, and that then and there George L. Walker Jr., also known as Snookie Walker, did wantonly run the vehicle he was driving into the vehicle the Plaintiff was riding, and as a direct proximate consequence and result of said wanton act the Plaintiff was wantonly injured, her left leg was broken in three places, she received lacerations on her face and body, she was permanently injured, caused to suffer much mental and physical pain and anguish; she was caused to expend monies for drugs, doctors and hospitalization; all to the loss and damage of the Plaintiff in the aforesaid amount.

And the Plaintiff further avers that the Defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, is and was on the day of said collision, to-wit, April 20, 1953, a non-resident of the State of Alabama, and that the present post office address of said Defendant is 208 West Maxwell Street, Pensacola, Florida, C/o C. C. Chancellor, and the Plaintiff prays that service of process upon the defendant, George L. Walker, Jr., also known as Snookie Walker, a minor, may be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

WILTERS & BRANTLEY

BY: William M. Brantley
Attorneys for Plaintiff

2025

MARY ALICE BUTTNER, A MINOR,
SUING BY NEXT FRIEND, ELMO M.
BUTTNER,

PLAINTIFF

VS

GEORGE I. WALKER JR., ALSO
KNOWN AS SNOOKIE WALKER, A MINOR,

DEFENDANT

AMENDED SUMMONS AND COMPLAINT

FILED

SEP 9 1953

ALICE J. DUCK, Clerk

THOMAS & GUNN

Edward M. Hall
Clerk