

GRADY HARRIS, A Minor, suing
by A. H. HARRIS, as his next
friend,

Plaintiff,

vs.

FRED FAULKNER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

PLEA

Comes now the Defendant, by his attorney, and for answer
to the Complaint says that he is not guilty of the matters therein
alleged.

By:

Inge, Litty, Armbricht & Jackson
Attorneys for Defendant

copy of
I hereby accept service of above Plea
this July 13-1953.

John H. Hannon
Attorney for Plea.

no 2086

PLEA

RECORDED

GRADY HARRIS, a Minor, suing
by A. H. HARRIS, as his next
Friend,

Plaintiff,

vs.

FRED FAULKNER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Filed July 13, 1953.

Alice L. Leuch
Clerk

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 Fred Faulkner 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 GRADY HARRIS, a Minor, suing by A. H. HARRIS, as his next friend.

Witness my hand this the 13th day of July, 1953.

W. J. Duck
Clerk

COMPLAINT

GRADY HARRIS, A Minor, suing
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COUNT ONE:

The Plaintiff claims of the Defendant the sum of Five Hundred and No/100 Dollars (\$500.00) as damages for that on heretofore, to-wit, November 4, 1952, Fred Faulkner, so negligently operated a motor vehicle on U. S. Highway No. 90 in Loxley, Baldwin County, Alabama, as to cause or allow said motor vehicle to run into, upon or against the said Grady Harris, who was standing several feet off the travel surface of the said Highway, and as a proximate result of the negligence of said Defendant the Plaintiff suffered great bodily harm in this: his right leg was broken and crushed and he was caused to lose time from his work and to suffer pain and anguish and to incur large medical costs, all to the damage of the Plaintiff as aforesaid, wherefore Plaintiff brings this suit and asks judgment in the above amount.

Service accepted July 13, 1953.
Inge, Zaitz, Brumback & Jackson
Attorneys for Defendant

CHASON & STONE

By: John Chason

Attorneys for Plaintiff

RECORDED

SUMMONS AND COMPLAINT

GRADY HARRIS, a Minor, suing
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Friend,

Plaintiff,

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IN THE CIRCUIT COURT OF

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LAW SIDE.

Filed July 13, 1953.

Alice J. French
Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

2036