

2077

LILY MAE SPIRES, a minor, by  
EUGENE SPIRES, as her next  
friend,

Plaintiff,

VS.

JOSEPH McCANTS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

### COMPLAINT

Plaintiff claims of the Defendant \$1,000.00 for that, on, to-wit: May 13, 1953, the Defendant negligently drove an automobile into or against an automobile truck in which the Plaintiff was riding on Highway 104, which is the public highway from Robertsedale to Fairhope in Baldwin County, Alabama, at a point near Silverhill immediately South of the residence of Ed Lyrene and as a proximate result of said negligence on the part of the Defendant, the Plaintiff was seriously injured and caused to suffer great pain and parts of her body were bruised, contused, her right clavicle was fractured, she suffered many abrasions, she was greatly shocked and impaired, she was made sick and sore for a long period of time, she was caused to suffer great physical pain and mental anguish and was put to much trouble in and about an effort to heal and cure her said wounds and injuries, all to Plaintiff's damage as aforesaid.

Jeffrey J. Maddux, Jr.  
Attorney for Plaintiff

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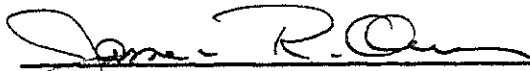
Defendant.

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ANSWER

Comes the Defendant in the above styled cause and for  
answer to the Complaint heretofore filed in said cause says as  
follows:

1. Not guilty.

  
Attorney for Defendant.

RECORDED

ANSWER

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FILED  
SEP 27 1953  
ALICE J. DUCK, Clerk