

VICTORIA 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 \$125.00 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 Roberts-dale to Fairhope in Baldwin County, Alabama, at a point near Silver-hill 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 and lacerated, and she was caused to suffer great physical pain and mental anguish and was put to much trouble and loss of time in and about an effort to heal and cure her said wounds and injuries, all to Plaintiff's damage as aforesaid.

Attorney for Plaintiff

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FILED Ser I 1953

ALICE I. DUCK, Register

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VICTORIA SPIRES, a minor, by EUGENE SPIRES, as her next friend, IN THE CIRCUIT COURT OF Plaintiff, BALDWIN COUNTY, ALABAMA VS. AT LAW JOSEPH McCANTS, Defendant.

## ANSWER

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

> Not guilty. l.

> > Attorney for Defendant.

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