

2122

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Charles C. Wimberly 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 same, then and there to answer the complaint of Stephen D. Rada, a Minor, suing by Helen C. Rada as his next friend.

Witness my hand this 29th day of October, 1953.

*Prince J. Leitch*  
Clerk

COMPLAINT

STEPHEN D. RADA, A Minor, suing  
by HELEN C. RADA, as his next  
friend,

Plaintiff,

vs.

CHARLES C. WIMBERLY,

Defendant.

1  
1  
1  
1  
1  
0

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Three Hundred Seventy-five Dollars (\$375.00) as damage for that heretofore, to-wit, on September 27, 1953, Charles C. Wimberly so negligently operated a motor vehicle on Pennsylvania Avenue in front of the Robertsdale theater in Robertsdale, Alabama, as to cause or allow said motor vehicle to run into, upon or against the said Stephen D. Rada and as a proximate result of the negligence of said Defendant the Plaintiff received severe blow on his head and he was caused to suffer pain and anguish all to the damage of the Plaintiff as afore-said, wherefore Plaintiff brings this suit and ask judgment in the above amount.

*Helen C. Rada*  
Plaintiff.

RECORDED

I hereby accept service of a copy  
of the within Summons and Com-  
plaint and waive further notice  
and service of same.

Dated this 29th day of October,  
1953,

Charles C. Wimberly  
Defendant

SUMMONS AND COMPLAINT

STEPHEN D. RADA, A Minor, suing  
by HELEN C. RADA, as his next  
friend,

Plaintiff,

vs.

CHARLES C. WIMBERLY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

Filed this 29th day of October,  
1953.

Archie French  
Clerk

STEPHEN D. RADA, A Minor, suing  
by HELEN C. RADA, as his next  
friend,

Plaintiff,

vs.

CHARLES C. WIMBERLY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

Comes the Defendant in the above styled cause and for plea  
to the Complaint filed in said cause says:

1. Not guilty.

  
Defendant.

~~RECORDED~~ 2

PLEA

STEPHEN D. RADA, A Minor, suing  
by HELEN C. RADA, as his next  
friend,

Plaintiff,

vs.

CHARLES C. WIMBERLY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed the 29th day of October,  
1953.

Alice J. Smith  
Clerk