HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR-FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

December 9, 1969

MAILING ADDRESS: P. O. DRAWER C OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-55||
AREA CODE 205

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

Re: Charles Ray Rider, Plaintiff, vs.
Ayre Sue Little, a minor, and
Ayres C. Little, Defendants
Circuit Court of Baldwin County,

Alabama - Case No. 8999

Dear Mrs. Duck:

CHAS. C. HAND

C. B. ARENDALL, JR.

T. MASSEY BEDSOLE

THOMAS G. GREAVES, JR. WM. BREVARD HAND

VIVIAN G.JOHNSTON.JR.

PAUL W. BROCK ALEX F. LANKFORD, III

ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. MEDOWELL
M. BAMSEY MEKINLEY, JR.

W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G, HAMP UZZELLE, III
THOMAS GUY GREAVES, III

Enclosed please find an answer in the above-styled case which I would appreciate your filing on behalf of the defendants. Please indicate on the enclosed copy of this letter the date of filing and return same to me in the self-addressed stamped envelope.

Thanking you in advance, I am

Very truly yours,

For the Firm

DFP/dm Encl.

CHARLES RAY RIDER,	χ	
Plaintiff,	χ	IN THE CIRCUIT COURT OF
	χ	
vs.	χ	BALDWIN COUNTY, ALABAMA
AYRE SUE LITTLE, a	χ	AT LAW
minor, and AYRES C. LITTLE,	X	
Defendants.	X	

INTERROGATORIES PROPOUNDED TO DEFENDANT AYRES C. LITTLE

Comes now the Plaintiff in the above styled cause and propounds the following Interrogatories to the Defendant, Ayres C. Little, viz:

- 1. Please state your full name.
- 2. Are you a resident of Baldwin County, Alabama?
- 3. Are you over the age of twenty-one years?
- 4. Did you, on the 21st day of January, 1969, own a 1963 Ford 4-Door passenger vehicle bearing 1969 Alabama License plate NO. 5-18988?
- 5. If the answer to the last above question is yes, was said vehicle on said day involved in an accident with a vehicle belonging to Charles Ray Rider?
- 6. At the time of the accident, was said vehicle being driven by Ayre Sue Little?
- 7. Was said vehicle being driven at said time and place with your permission?
- 8. State the purpose for which you authorized the use of this vehicle by Ayre Sue Little.

CHASON, STONE & CHASON

Attorneys for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Earle Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say as follows:

That he is one of the Attorneys of Record in the above styled cause and that he is informed and believes and upon such information and belief states that the answers to the foregoing Interrogatories propounded to the Defendant, Ayres C. Little, will be material evidence in the case.

John Earle Chason

Sworn to and subscribed before me this 17^{+1} day of November,

1969.

Notary Public Baldwin County, Alabama

NOV 17 1969

ALGE J. DIUK CLERK REGISTER Charles Ray Rider Pltyrevie Hypes C. Little dal.

By service on...

TAYLOR WILKINS, Sheriff
By Junday

Chason, Itone & Chason

CHARLES RAY RIDER,	χ	
Plaintiff,	χ	IN THE CIRCUIT COURT OF
	χ	
VS.	χ	BALDWIN COUNTY, ALABAMA
	χ	
AYRE SUE LITTLE, a minor, and AYRES C.	χ	AT LAW
LITTLE,	χ	
Defendants.	χ	

INTERROGATORIES PROPOUNDED TO DEFENDANT, AYRE SUE LITTLE

Comes now the Plaintiff in the above styled cause and propounds the following Interrogatories to the Defendant, Ayre Sue Little, viz:

- 1. Please state your full name.
- 2. Please state your age.
- 3. On the 21st day of January, 1969, were you involved in an automobile accident?
- 4. At said time and place, were you driving a 1963 Ford 4-Door motor vehicle belonging to your Father?
- 5. Were you driving the vehicle with your Father's permission?
- 6. For what purpose were you using the vehicle at the time and place of the accident?

CHASON, STONE & CHASON

Attorneys for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Earle Chason, who is known to me and who, after being

by me first duly and legally sworn, did depose and say as follows:

That he is one of the Attorneys of Record in the above styled cause and that he is informed and believes and upon such information and belief states that the answers to the foregoing Interrogatories propounded to the Defendant, Ayre Sue Little, will be material evidence in the case.

John Earle Chason

me this 17 day of November,

1969.

Notary Public, Baldwin County, Alabama

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ALIE J. DIEK CLERK REGISTER

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Charles Ray Rider Pety.

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TAYLOR WILKINS, Sheriff
By D. J. Jelley D. ;

Chason, Stone + Chason

CHARLES RAY RIDER,

§ IN THE CIRCUIT COURT OF

Plaintiff,

§ BALDWIN COUNTY, ALABAMA

VS.

AYRE SUE LITTLE, a minor, § AT LAW and AYRES C. LITTLE,

Defendants. § CASE NO. 8999

ANSWER

Comes now each of the defendants in the above-styled cause and for separate and several answer to each count of the complaint heretofore filed, sets down and assigns the following pleas, separately and severally.

- Not guilty.
- 2. At the time and place alleged in the complaint, to-wit, January 21, 1969 on U. S. Highway No. 31 opposite Still Motor Company in the City Limits of Bay Minette, Baldwin County, Alabama, while the defendant Ayre Sue Little was operating an automobile at said time and place on said highway, the plaintiff did so negligently operate an automobile on said highway at said time and place so as to cause same to become involved in an accident with the automobile being operated by said defendant; and as a direct and proximate consequence of the negligence of the plaintiff, as aforesaid, plaintiff contributed to the accident and

his alleged injuries and damages; therefore, plaintiff ought not recover.

Donald F. Pierce

Trial Attorneys for Defendants

OF COUNSEL

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendants respectfully demand a trial by jury.

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing answer to John Earle Chason, Esquire, Attorney for plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to Mr. Chason at his office in Bay Minette, Alabama, on this the 9th day of December, 1969.

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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 Ayre Sue Little, a minor, and Ayres C. Little, 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 Charles Ray Rider.

Witness my hand this ZZ day of November, 1969.

Oliebary Ouek

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	CHARLES RAY RIDER,	Υ χ	
	Plaintiff,	χ	IN THE CIRCUIT COURT OF
		X	
	vs.	X	BALDWIN COUNTY, ALABAMA
		χ	
	AYRE SUE LITTLE, a	χ	AT LAW
	inor, and AYRES C. ITTLE,	χ	8999
Distance and distance	Defendants.	χ	

The Plaintiff claims of the Defendants the sum of
Twenty-five Thousand Dollars (\$25,000.00) as damages for that heretofore on, to-wit: the 21st day of January, 1969, at approximately
3:11 P. M. at a point on U. S. Highway No. 31 opposite Still Motor
Company in the City Limits of Bay Minette, Baldwin County, Alabama,
the Defendant Ayre Sue Little, who was then and there the agent,
servant or employee of the Defendant Ayres C. Little, and at said
time and place, acting within the line and scope of her authority
as such agent, servant or employee, so negligently operated a

motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to and being operated by the Plaintiff and as a proximate result of said negligence, the Plaintiff's vehicle was severely damaged in that its grill, front fenders, hood and its left side were bent, damaged or broken, the Plaintiff received severe personal injuries in that his left hand or wrist was broken and he received a severe blow to his head causing lacerations and aninjury to his neck or spine; the Plaintiff was caused to endure much pain, suffering and anxiety and was caused to incur large hospital and medical bills and expenses in connection with his care and treatment and it is not certain at this time whether or not the injuries to the Plaintiff are permanent in nature; the Plaintiff was further caused to lose much time from his employment, all of said injuries being the proximate result of the negligence of the Defendants as aforesaid in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: Sarli Chason

The Plaintiff respectfully demands a trial of this cause by a jury.

CHASON, STONE & CHASON

By: Sharon

Plaintiff is informed that the Defendant Ayre Sue Little is a minor under the age of twenty-one years and respectfully requests the Court to appoint a Guardian ad Litem to represent and defend said minor in the prosecution of this cause.

CHASON, STONE & CHASON

NOV 17 1969

ALOS J. BOOK CLERK REGISTER

By: John & Chason

CHARLES RAY RIDER,

Plaintiff,

Vs.

AYRE SUE LITTLE, a minor, and AYRES C. LITTLE,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

NOV 17 1969

CHASON, STONE & CHASON

ATTORNEYS AT LAW
P. O. BOX 120

BAY MINETTE, ALABAMA

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