

CLARENCE BRUCE WRIGHT, a minor, X  
suing by and through X  
CLARENCE MARVIN WRIGHT, as X IN THE CIRCUIT COURT OF  
Father and next friend, X  
X  
Plaintiff, X  
X BALDWIN COUNTY, ALABAMA  
X  
vs. X  
X  
X AT LAW  
EUGENE A. MIKKELSEN, X  
X 9/35  
Defendant. X  
X

PLEAS:

Comes now the Defendant in the above styled cause, by  
and through its attorneys of record, and for answer to the Com-  
plaint heretofore filed against it says, separately and severally,  
as follows:

1. Not guilty.

CHASON, STONE & CHASON

By: John S. Chason  
Attorneys for Defendant

FILED

FEB 19 1970

ALICE J. BUCK CLERK  
REGISTER

CLARENCE BRUCE WRIGHT, a minor, X  
suing by and through  
CLARENCE MARVIN WRIGHT, as X  
Father and next friend,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

vs.

EUGENE A. MIKKELSEN,  
Defendant.

AT LAW  
9/35

The Plaintiff claims of the Defendant the sum of Fifteen Hundred Dollars (\$1500.00) as damages for that heretofore on, to-wit: the 14th day of August, 1967, at a point in Baldwin County, Alabama on the real property of the Defendant in Summerdale, Alabama, where the Plaintiff had a right to be, the Defendant so negligently operated a motor vehicle, to which was attached a farming implement known as a cultipacker, as to cause or allow the same to run over the person of the Plaintiff thereby breaking his left leg and tearing the ligaments in his right ankle and by breaking his left shoulder and arm, all of which said damage were the proximate result of the negligence of the Defendant, as aforesaid, to the damage of the Plaintiff in the sum above mentioned, hence this suit.

*John M. B. Randle*  
Attorney for Plaintiff

I do hereby accept service of the above Complaint as attorney for the defendant this 19th day of February, 1970.  
*John E. Chason*

FILED

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ALICE J. DUCK CLERK  
REGISTER