

STATE OF ALABAMA)
 To any Sheriff of the State of Alabama
COUNTY OF BALDWIN)

You are hereby commanded to summon Riley Chenel Smith to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Michael Smith.

Witness my hand this 19 day of June, 1970.

Alice J. Duck
ALICE DUCK, Clerk

MICHAEL SMITH, a minor,	:	IN THE CIRCUIT COURT
by and through his	:	
mother and next friend,	:	OF BALDWIN COUNTY,
MONTEZE DALEY SMITH,	:	
	:	ALABAMA
Plaintiff,	:	
	:	AT LAW
VS.	:	
	:	
RILEY CHENEL SMITH,	:	
	:	
Defendant.	:	CASE NUMBER <u>9345</u>

C O M P L A I N T

Plaintiff, Michael Smith, a minor six (6) years of age, by and through his mother and next friend, Monteze Daley Smith, claims of the Defendant, Riley Chenel Smith, FOUR THOUSAND AND NO/100 (\$4,000.00) DOLLARS, as damages, for that heretofore on, to-wit,

the 27th day of March, 1970, the Defendant so negligently operated a motor vehicle he was driving on or along United States Highway Ninety (90), a public road in Baldwin County, State of Alabama, at or near, to-wit, three and one-tenth (3.1) miles West of the City of Loxley, Alabama, so as to cause or allow the same to run into, over, upon or against the vehicle in which the Plaintiff was then and there a passenger, and as a direct and proximate result of the negligence of the Defendant Plaintiff was injured and damaged as follows: Plaintiff sustained injury to his stomach, Plaintiff was bruised and contused about his head and body; Plaintiff was injured internally and externally; Plaintiff was made sick and sore; Plaintiff was caused to suffer mental anguish; Plaintiff was caused to suffer physical pain and will so suffer in the future; Plaintiff was permanently injured, all as a direct and proximate result of the negligence of the Defendant as aforesaid.

WHEREFORE, Plaintiff sues and seeks to recover in the amount of FOUR THOUSAND AND NO/100 (\$4,000.00) DOLLARS.

TYSON, MARR AND FRIEDLANDER
Post Office Box 1792
Mobile, Alabama 36601
Attorneys for Plaintiff

By Thomas M. Marr
Thomas M. Marr
P.O. Box 1792, Mobile, Ala 36601

Plaintiff respectfully requests a trial by struck jury.

Thomas M. Marr
DESIGNATED TRIAL ATTORNEY

Defendant may be served:

Post Office Box 267
Loxley, Alabama

VOL

65 630

JUN 19 1970

ALICE J. DUCK CLERK
REGISTER

44-7-21-70

Received 22 day of July 1970
and on 21 day of July
I served a copy of the within At
on Riley C. Smith

By service on _____

TAYLOR WILKINS, Sheriff
By H. H. Jones D.S.
40 miles R.T.
40 miles supply

Sheriff claims 40 miles at 40
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
Brown
BY Brown DEPUTY SHERIFF

9345

Michael Smith, a
minor by + through
his mother + next
friend
Montez Daley Smith
Pety
vs.
Riley Chene Smith

Syson, Mass + Friedlander