

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

You are hereby commanded to summon Mike Morris, a minor 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 Donald Ray Peavy, a minor.

Witness my hand this 26 day of August, 1970.

*Alice D. Alcock*  
Clerk

DONALD RAY PEAUVY,	X	
a minor, suing by		
and through DOUGLAS	X	IN THE CIRCUIT COURT OF
D. PEAUVY, his father		
and next friend,	X	BALDWIN COUNTY, ALABAMA
Plaintiff,	X	
	X	AT LAW
vs.	X	9450
MIKE MORRIS	X	
Defendant.	X	

The Plaintiff claims of the Defendant the sum of \$5,000.00 as damages for that heretofore on to-wit the 11th day of June, 1970 at a point near Foley in Baldwin County, Alabama, the Defendant did commit an Assault and Battery on the Plaintiff by wrongfully and unlawfully beating and kicking the Plaintiff thereby causing the Plaintiff to suffer the following personal injuries and damages: He was bruised and lacerated in and around his head and face; he was made sick, sore and lame for a long period of time and was caused to incur hospital and medical

bills and expenses; he lost two teeth and was caused to lose approximately eight weeks from his employment; the Plaintiff further claims punitive damages of the Defendant for and on account of said Assault and Battery.

CHASON, STONE & CHASON

By: John E. Chason

The Plaintiff respectfully  
demands a trial by jury.

CHASON, STONE & CHASON

By: John E. Chason

The Plaintiff is informed and believes that the Defendant is a minor and respectfully requests that the Court appoint a guardian ad litem to defend this suit for said minor.

CHASON, STONE & CHASON

By: John E. Chason

**FILED**

AUG 26 1970

**ALICE J. DUCK** CLERK  
REGISTER

Returned 31 day of Aug 1970 (Wey m. Sta.)

Not R. and B. pay 100.00

Aug 1970 (Wey m. Sta.)

By W. BROWN Deputy Sheriff

Received 26 day of Aug 1970  
and on 29 day of Aug 1970  
I served a copy of the within  
on Mike Morris & father

By service on Mr. Morris the father

Sheriff claims 60 miles at  
Ten Cents per mile Total \$ 6.00  
TAYLOR WILKINS, Sheriff  
BY Brown DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff  
By H. Brown D.S.

I will 60 miles R.T.

DONALD RAY PEAVY, a minor,  
suing by and through DOUGLAS  
D. PEAVY, his father and  
next friend,

Plaintiff,

vs.

MIKE MORRIS,  
Silverhill

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

\* \* \* \* \*

SUMMONS and COMPLAINT

\* \* \* \* \*

FILED

AUG 26 1970  
CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P.O. Box 120  
BIRMINGHAM, ALABAMA  
ALICE J. BUCK REGISTER

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

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Witness my hand this 26 day of August, 1970.

  
Clerk

DONALD RAY PEAUVY,  
a minor, suing by  
and through DOUGLAS  
D. PEAUVY, his father  
and next friend,

Plaintiff,

vs.

MIKE MORRIS

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

9450

The Plaintiff claims of the Defendant the sum of \$5,000.00 as damages for that heretofore on to-wit the 11th day of June, 1970 at a point near Foley in Baldwin County, Alabama, the Defendant did commit an Assault and Battery on the Plaintiff by wrongfully and unlawfully beating and kicking the Plaintiff thereby causing the Plaintiff to suffer the following personal injuries and damages: He was bruised and lacerated in and around his head and face; he was made sick, sore and lame for a long period of time and was caused to incur hospital and medical

bills and expenses; he lost two teeth and was caused to lose approximately eight weeks from his employment; the Plaintiff further claims punitive damages of the Defendant for and on account of said Assault and Battery.

CHASON, STONE & CHASON

By: John E. Chason

The Plaintiff respectfully  
demands a trial by jury.

CHASON, STONE & CHASON

By: John E. Chason

The Plaintiff is informed and believes that the Defendant is a minor and respectfully requests that the Court appoint a guardian ad litem to defend this suit for said minor.

CHASON, STONE & CHASON

By: John E. Chason

FILED

AUG 26 1970

ALICE J. DUCK CLERK  
REGISTER

bill and expenses; he lost two teeth and was caused to lose approximately eight weeks from his employment; the Plaintiff further claims punitive damages of the Defendant for and on account of said Assault and Battery.

CHASON, STONE & CHASON

for  
boy is in Louisiana  
dent have address

The Plaintiff respectfully  
demands a trial by jury.

CHASON, STONE & CHASON

BY: John S. Chason

The Plaintiff is informed and believes that the Defendant is  
a minor and respectfully requests that the Court appoint a  
guardian ad litem to defend this suit for said minor.

CHASON, STONE & CHASON

BY: John S. Chason

FILED

AUG 26 1970

WILLIE J. DUCK  
REGISTER  
CLERK

DONALD RAY PEAVY,  
a minor, suing by and  
through DOUGLAS D. PEAVY,  
his father and next friend

Plaintiff

VS.

MIKE MORRIS

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9450

ANSWER

1.

The Defendant for answer to the Complaint, saith  
that the matters alleged in the Plaintiff's Complaint are untrue.

2.

For further answer to this Complaint, the Defendant  
says that he is a minor, 20 years of age, and that he has retained  
the firm of WILTERS, BRANTLEY & NESBIT to represent him and act as  
guardian ad litem in this matter. That it will not be necessary  
for the Court to appoint a guardian ad litem for him.

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit  
Attorneys for Defendant

FILED

SEP 3 1970

ALICE J. DUCK

CLERK  
REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 3 day of Sept  
1970 served a copy of the foregoing on him on account for all  
parties to this proceeding by mailing the same by United States  
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit

FILED

SEP 3 1970

ALICE J. DUK  
CLERK  
REGISTER