

PATRICK H. DUCK, a minor
suing by and through ROBERT
DUCK, as his Father and
next friend,

Plaintiff,

vs.

KARL SCHULTZ,

Defendant.

X
X
X
X
X
X
X
X
X

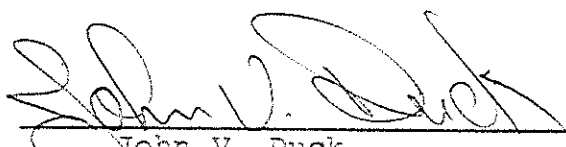
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

The Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit: the 20th day of June, 1970, at the intersection of Highway 98 and Highway 59 in Foley, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle in which the Plaintiff was riding and as a direct and proximate result of such negligence, the Plaintiff suffered a separated shoulder to his damage as aforesaid, hence this suit.



John V. Duck
Attorney for Plaintiff

PATRICK H. DUCK, a minor
suing by and through ROBERT
DUCK, as his Father and
next friend,

Plaintiff,

vs.

KARL SCHULTZ,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Defendant in the above styled cause, by
and through his Attorneys of Record and for plea to said Complaint,
says separately and severally as follows:

1. Not guilty.

CHASON, STONE & CHASON

By: _____
Attorneys for Defendant

PATRICK H. DUCK, a minor
suing by and through ROBERT
DUCK, as his Father and
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IN THE CIRCUIT COURT OF

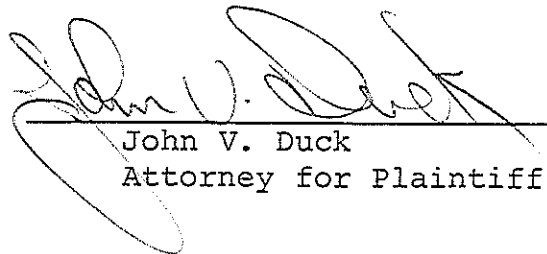
BALDWIN COUNTY, ALABAMA

AT LAW

9521

COMPLAINT

The Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit: the 20th day of June, 1970, at the intersection of Highway 98 and Highway 59 in Foley, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle in which the Plaintiff was riding and as a direct and proximate result of such negligence, the Plaintiff suffered a separated shoulder to his damage as aforesaid, hence this suit.


John V. Duck
Attorney for Plaintiff

FILED

NOV 3 1970

ALICE J. DUCK CLERK
REGISTER

PATRICK H. DUCK, a minor
suing by and through ROBERT
DUCK, as his Father and
next friend,

Plaintiff,

vs.

KARL SCHULTZ,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Defendant in the above styled cause, by
and through his Attorneys of Record and for plea to said Complaint,
says separately and severally as follows:

1. Not guilty.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Defendant

FILED

NOV 3 1970

ALICE J. DUCK

CLERK
REGISTER