

JAMES M. EARLE, as Father
and next friend of SHANNON
EARLE, a minor,

Plaintiff,

vs.

RUDOLPH KRHUT,

Defendant.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

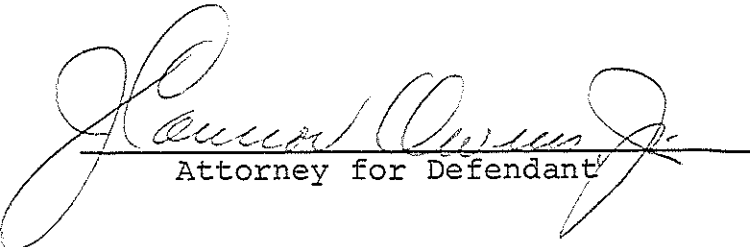
BALDWIN COUNTY, ALABAMA

AT LAW

PLEA

Comes the Defendant in the above styled cause and for
plea to the Complaint filed in said cause, says:

1. Not guilty.


Attorney for Defendant

FILED

DEC 16 1970

ALICE J. BUCK

CLERK
REGISTER

STATE OF ALABAMA


IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Rudolph Krhut 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 James M. Earle, as the Father and next friend of Shannon Earle, a minor.

Witness my hand this 18 day of December, 1970.


Clerk

JAMES M. EARLE, as Father
and next friend of SHANNON
EARLE, a minor,

Plaintiff,

vs.

RUDOLPH KRHUT,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

9512

The Plaintiff claims of the Defendant the sum of One Thousand Five Hundred Dollars (\$1,500.00) as damages for that on, to-wit: December 28, 1969, on U. S. Highway 98 at a point where it is intersected by Daphmont Road, in Baldwin County, Alabama Arlene Krhut, as anagent, servant or employee of Rudolph Krhut, who was then and there acting within the line and scope of her agency, negligently drove an automobile into or against the automobile in which Shannon Earle was then and there riding and as a proximately result of such negligence, the said Shannon Earle was injured in this: both collarbones were fractured, she was

bruised and made sore and caused to suffer much pain and mental anguish, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

James Stone & Thomas
Attorneys for Plaintiff

FILED

SEP 16 1970

ALICE J. DUCK CLERK
REGISTER