

KATHERINE WATSON, a minor suing
by and through her next friend and
mother, HARRIETTE J. WATSON

Plaintiff

VS

LEIGH B. BROWN

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

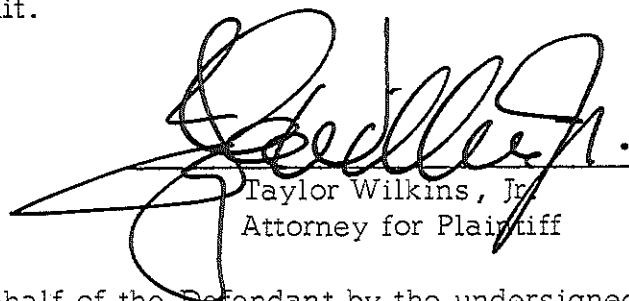
AT LAW

CASE NO:

9885

COMPLAINT

The Plaintiff alleges that her father is deceased and she brings this action by and through her next friend and mother, Harriett J. Watson, and claims of the Defendant the sum of THREE HUNDRED (\$300.00) DOLLARS as damages for that heretofore and on, to-wit, October 16, 1970, at a point on U. S. Highway No. 98, a public road in the County of Baldwin, State of Alabama, approximately .7 miles East of Elberta, Alabama, the Defendant so negligently operated an automobile so as to cause it to run into, upon or against the Plaintiff who was then and there at said time and place in said road where she had a right to be and as the proximate result of the negligence of the Defendant, the Plaintiff suffered a broken right ankle and broken left leg; she was made sick, sore and lame and was caused to spend money for hospital and doctor bills all to her damages aforesaid, hence this suit.


Taylor Wilkins, Jr.
Attorney for Plaintiff

Service accepted on behalf of the Defendant by the undersigned, his attorney, this 22nd day of April, 1971.

FILED

APR 27 1971

EUNICE B. BLACKMON
CLERK


James B. Kierce, Jr.

KATHERINE WATSON, a Minor	:	IN THE CIRCUIT COURT OF
suing by and through her	:	
mother, and next friend,	:	BALDWIN COUNTY, ALABAMA
HARRIETTE J. WATSON,	:	
	:	
Plaintiff,	:	AT LAW
	:	
vs.	:	
	:	
LEIGH B. BROWN,	:	CASE NO. _____
	:	
Defendant.	:	

COMES NOW the Defendant, through his attorney, James B. Kierce, Jr., and accepts service and enters this, his appearance, and for answer to the Plaintiffs' complaint, says as follows:

1. Not guilty.
2. That the material allegations are untrue.

LYONS, PIPES AND COOK
Attorneys for the Defendant

By:

James B. Kierce, Jr.
JAMES B. KIERCE, JR.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 27th day of April, 1971, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

FILED

APR 27 1971

EUNICE B. BLACKMON CIRCUIT CLERK