FRANK FROST, a minor, suing by

: IN THE CIRCUIT COURT OF

and through JOHN FROST, as his

BALDWIN COUNTY, ALABAMA

father and next friend,

PLAINTIFF,

AT LAW

VS

:

CHARLES JAMES WEEKS,

CASE NO.

DEFENDANT.

COMPLAINT

COUNT I

The Plaintiff claims of the Defendant FOUR THOUSAND AND NO/100 (\$4,000.00) DOLLARS for that heretofore on, to-wit, September 28, 1970, at a point on U.S. Highway 98, at the intersection of said U.S. Highway 98 and Pecan Street, both public roads in Baldwin County, 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 riding a Honda motorbike at a place where he had a right to be and as the proximate result of the negligence of the Defendant, the Plaintiff suffered a broken left leg; he was made sick, sore and nervous and was caused to spend money for hospital and doctor bills all to his damages aforesaid hence this suit.

> Jame's R. Owen Plaintiff's Attorney

FILED

APR 27 1971

EUNICE B. BLACKMON CIRCUIT

FRANK FROST, a minor, suing by

and through JOHN FROST, as his

: IN THE CIRCUIT COURT OF

father and next friend,

BALDWIN COUNTY, ALABAMA

PLAINTIFF,

AT LAW

VS

CHARLES JAMES WEEKS,

CASE NO. 9886

DEFENDANT.

PLEA

Comes now the Defendant, Charles James Weeks, separately and severally, and without waiving the demurrer heretofore filed to the Plaintiff's complaint, files this plea to the Plaintiff's complaint and each count thereof separately and severally:

The Defendant denies each and every allegation of the Plaintiff's complaint and each count thereof and demands strict proof of the same.

Maylor Wilkins,

Attorney for Defendant

FILED

APR 27 1971

EUNICE B. BLACKMON CLERK

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