

BRIDGET DIANNE LASSITER, a minor )  
suing by and through her next )  
friend and mother, JEANNETTE )  
LASSITER, )

Plaintiff, )

vs. )

JOSEPH L. WATTS, JR. and )  
MICHAEL WATTS, a minor, jointly )  
and severally, )

Defendants. )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY,

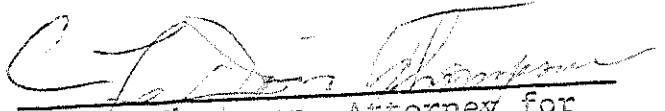
ALABAMA

CASE NO. 10,376

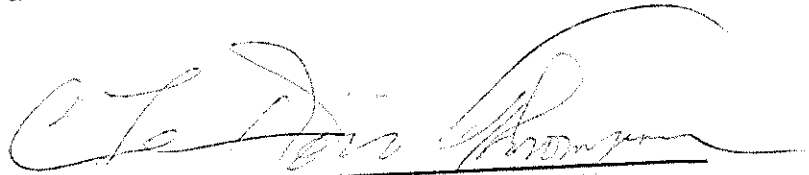
COUNT ONE

The Plaintiff, a minor, suing by and through her mother and next friend, claims of the Defendants the sum of Two Thousand Three Hundred and No/100 (\$2,300.00) Dollars, as damages, for that on, to-wit, the 2nd day of November, 1971, the Plaintiff rode as a passenger in a vehicle being operated on and along Alabama Highway Number 138, between County Road Number 435 and County Road Number 40, a public road or highway in the County of Baldwin, State of Alabama, at which time and place, the Defendant Michael Watts, a minor, while acting as an agent, servant or employee of the Defendant Joseph L. Watts, Jr., and while acting within the line and scope of his authority and duty as such agent or servant, so negligently operated a motor vehicle on and along the said Alabama Highway 138 between County Road Number 435 and County Road Number 40, in the County of Baldwin, State of Alabama, as to cause or allow the said vehicle to collide with the vehicle in which the Plaintiff rode as a passenger; and as a direct and proximate result of the negligence of the Defendants as aforesaid, the Plaintiff was injured, lacerated, contused and bruised in and about her head, limbs, and body, she sustained a broken femur, she received permanent injuries, and she was caused to suffer great physical

pain and mental anguish; for all of which she brings this suit and asks judgment for the above amount.

  
LeNoir Thompson, Attorney for  
the Plaintiff.

The Plaintiff demands a trial by jury.

  
LeNoir Thompson

FILED

MAY 3 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

BRIDGET DIANNE LASSITER,	:	IN THE CIRCUIT COURT OF
a minor suing by and		
through her next friend and		
mother, JEANETTE LASSITER,	:	BALDWIN COUNTY,
Plaintiff,	:	ALABAMA
vs.	:	
JOSEPH L. WATTS, JR., and	:	
MICHAEL WATTS, a minor,	:	
jointly and severally,	:	
Defendants.	:	CASE NO. 17-17

COMES NOW, Joseph L. Watts, Jr., plaintiff in the above-styled cause, by and through his attorney, Cooper C. Thurber, and shows unto this Honorable Court that the Defendant, Michael Watts, is a minor child of the age of nineteen (19) years and moves that this Honorable Court will appoint his attorney, Cooper C. Thurber, as Guardian Ad Litem to represent the interests of the defendant, Michael Watts, in this cause.

Joseph C. Wood  
 Judge of the Circuit Court of  
 Baldwin County, Alabama

FILED

MAY 3 1972

EUNICE B. BLACKMON CLERK

BRIDGET DIANNE LASSITER,  
a minor suing by and through  
her next friend and mother,  
JEANNETTE LASSITER,

Plaintiff,

vs.

JOSEPH L. WATTS, JR. and  
MICHAEL WATTS, A minor,  
jointly and severally,

Defendants.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY,

: ALABAMA

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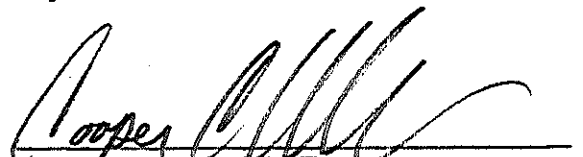
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: CASE NO. \_\_\_\_\_

COMES NOW, Cooper C. Thurber, attorney for Joseph L. Watts, Jr., and Guardian Ad litem for Michael Watts, a minor, and on behalf of each of the defendants, he accepts service of process in this cause; and for answer to the plaintiffs' complaint, the defendants say as follows:

1. They deny the material allegations.
2. That they are not guilty.

BY:



COOPER C. THURBER, as attorney  
for Joseph L. Watts, Jr., and  
as Guardian Ad litem for Michael  
Watts, a minor.

FILED

MAY 3 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK