

W. Frank

~~FRANK~~ GARDNER, As the Father  
and Next Friend of Mytris  
GARDNER, a Minor,

Plaintiff,

VS.

RUTH MCKINLEY MEADER, and  
GEORGE MEADER,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Come the Defendants in the above styled cause and for answer  
to the Complaint filed in said cause, say:

1. Not guilty.

Ruth McKinley Meader

George Meader  
Defendants.

702227  
RECORDED

ANSWER

FRANK W. GARDNER, As the Father  
and Next Friend of MYTRIS GARDNER  
A Minor,

Plaintiff,

VS.

RUTH MCKINLEY MEADOR and  
GEORGE MEADOR,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed this the 7th day of April,  
1954.

Rice A. Duck  
Clerk,

STATE OF ALABAMA)  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby ~~com~~manded to summon Ruth McKinley Meader and George Meader 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 Frank W. Gardner, As the Father and Next Friend of Mytris Gardner, A Minor.

Witness my hand this 7th day of April, 1954.

*Perce J. Smith*  
Clerk.

*W. F. Gardner*  
~~FRANK~~ W. GARDNER, As the Father  
and Next Friend of Mytris GARDNER,  
A Minor,

Plaintiff,

vs.

RUTH MCKINLEY MEADER and  
GEORGE MEADER,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendants the sum of One Hundred and Twenty Five Dollars (\$125.00) as damages for that heretofore on, to-wit, the night of April 25, 1953, the Defendant, George Meader, so negligently operated a motor vehicle, as the agent, servant or employee of the Defendant, Ruth McKinley Meader, while acting within the line and scope of his employment as such on the Foley-Gulf Shores Highway in front of Ethels Spinning Wheel, in Baldwin County, Alabama, as to cause or allow such motor vehicle to run into or against an automobile in which Mytris Gardner, a Minor, thirteen years of age was riding and as a proximate consequence of such negligence the said Mytris Gardner was injured in this, she received a severe concussion and multiple bruises and the Plaintiff alleges that the negligence of the Defendants was the proximate cause of the injuries and damages complained of the amount here sued for.

*W. F. Gardner*  
As Father and next Friend of  
Mytris Gardner

W 22 27  
RECORDED

SUMMONS AND COMPLAINT

We, the undersigned, do hereby accept service of a copy of the within Summons and Complaint and waive further service of the same.

Dated this 7th day of April, 1954.

FRANK W. GARDNER, As the Father  
and Next Friend of MYTRIS GARDNER,  
A Minor,

Plaintiff,

Ruth McKinley Meader

VS.

George Meader

RUTH MCKINLEY MEADER, and  
GEORGE MEADER,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

Filed this the 7th day of April,  
1954.

Deice J. Leuch  
Clerk