

VERLEE McQUEEN, A Minor, suing	I	
by ALICE M. McQUEEN, As Next	I	
Friend,	I	
	I	
Plaintiff,	I	
	I	
vs.	I	IN THE CIRCUIT COURT OF
	I	BALDWIN COUNTY, ALABAMA
ALVIN CRAWFORD, as Administrator	I	
of JAMES TERRY TAYLOR, JR., DE-	I	AT LAW. NO. _____
CEASED,	I	
	I	
Defendant.	I	
	I	

Now comes Alvin Crawford, formerly Administrator of the Estate of James Terry Taylor, Jr., Deceased, and appearing specially for the purpose of filing this plea and for no other purpose and respectfully shows to the Court as follows:

That the said Alvin Crawford was appointed Administrator of the Estate of James Terry Taylor, Jr., Deceased, by the Probate Court of Escambia County, Alabama, on, to-wit, May 3, 1954, and that he was acting as such Administrator when the summons and complaint in this cause was served upon him on, to-wit, May 29, 1954; Alvin Crawford further shows to the Court that on, to-wit, June 4, 1954, he resigned as Administrator of the Estate of James Terry Taylor, Jr., Deceased, and that on said date Letters of Administration in said Estate were issued by the Probate Court of Escambia County, Alabama, to J. Luther Mills, Sheriff of Escambia County, as Administrator of said Estate.

WHEREFORE, said Alvin Crawford avers that this suit should be abated or dismissed as to Alvin Crawford as Administrator of the Estate of James Terry Taylor, Jr., Deceased.

*Davis & Williams*  
*and*  
*Chambers & Shaw*  
As Attorneys for Alvin Crawford  
formerly Administrator of the  
Estate of James Terry Taylor, Jr.,  
Deceased.

STATE OF ALABAMA

BALDWIN COUNTY

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Personally appeared before me, the undersigned authority in and for said State and County, Marvin Williams, Jr., who being by me first duly sworn, on oath deposes and says that he is one of the attorneys for the above Defendant and that he has knowledge of the facts and that the foregoing averments are true and correct.

Marvin Williams, Jr.

Sworn to and subscribed before  
me this 11th day of June, 1954.

Malcolm S. Stone, Jr.  
Notary Public, Baldwin County, Alabama.

FILED

6-11-54

ALICE I. CUCK, Clerk

2275

VERLEE McQUEEN, A Minor, suing  
by ALICE M. McQUEEN, As Next  
Friend,

Plaintiff,

vs.

ALVIN CRAWFORD, as Administrator  
of JAMES TERRY TAYLOR, JR., DE-  
CEASED,

Defendant.

\*\*\*\*\*  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW. NO. \_\_\_\_\_  
\*\*\*\*\*

PLEA IN ABATEMENT

\*\*\*\*\*  
Filed this 11<sup>th</sup> day of June, 1954.  
*Wm. J. Stone*

LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA

STATE OF ALABAMA,       0  
                               0  
 COUNTY OF BALDWIN.     0       TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ALVIN CRAWFORD, as Administrator of the Estate of JAMES TERRY TAYLOR, JR., Deceased, 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 the same, then and there to answer the complaint of VERLEE McQUEEN, a Minor, SUING BY ALICE M. McQUEEN, AS NEXT FRIEND.

Witness my hand this 25<sup>th</sup> day of May, 1954.

Alice M. McQueen  
 C L E R K.

\*\*\*\*\*

C O M P L A I N T

VERLEE McQUEEN, A MINOR, SUING	0	
BY ALICE M. McQUEEN, AS NEXT	0	IN THE CIRCUIT COURT OF
FRIEND,	0	BALDWIN COUNTY, ALABAMA.
	0	
Plaintiff,	0	AT LAW.
	0	
VS.	0	NO. _____
	0	
ALVIN CRAWFORD, AS ADMINIS-	0	
TRATOR OF THE ESTATE OF JAMES	0	
TERRY TAYLOR, JR., DECEASED,	0	
	0	
Defendant.	0	

C O U N T   O N E.

The plaintiff claims of the defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages, for that, heretofore, on to-wit: the 7th day of November, 1953, at about, to-wit: 5:00 P. M., the plaintiff was riding as a passenger in an automobile on a public highway, viz: U. S. Highway No. 31 and 90, in Baldwin County, Alabama, at a point on the East end of Appalachee River Bridge, about 4.8 miles east of the City Limits of Mobile, Alabama, where he had a right to be, and the Deceased, JAMES TERRY TAYLOR, JR., so negligently operated an automobile, which he was then and there driving, as to cause said automobile he was operating to run over, upon or against the automobile in which plaintiff was then and there riding as a passenger; and

plaintiff avers that as a proximate consequence thereof she suffered serious and permanent injuries to her face, head, limbs and body; she suffered multiple cuts, bruises, abrasions and lacerations about her face, head, limbs and body; she was made sick, sore, lame and disordered; she was caused to suffer great and permanent mental and physical anguish; she was caused to suffer a severe concussion of the brain; her left knee was dislocated, and the dislocation compounded, and was permanently injured; her right femur was broken and permanently injured; her right tibia was broken and permanently injured; both of her ankles were bruised and sprained and permanently injured; she was caused to lose much time from her work and suffered great financial loss as a result thereof; and plaintiff was caused to spend large sums of money for doctors' bills, hospital bills, and nurses' bills, and for medical attention and medical supplies in and about the treatment of the injuries which plaintiff received, all to the damage of the plaintiff as aforesaid. And plaintiff avers that all of his damages were proximately caused by the said negligence of the Deceased, JAMES TERRY TAYLOR, JR, in and about the negligent operation of said automobile at the time and place and on the occasion aforesaid; wherefore/<sup>s</sup>he sues.

Jessie J. Maduberry Jr.

Plaintiff respectfully requests that this cause be tried by a jury.

Jessie J. Maduberry Jr.

FILED

5-25-54

ALICE J. DUCK, Clerk

Received in Sheriff's Office  
this 25 day of May, 1954  
TAYLOR WILKINS, Sheriff

Executed this 29 day  
of May, 1954 by serving  
a copy of the within.

on Alvin Crawford  
by J. L. Mills  
Sheriff  
By C. Shurt D.S.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 2275

VERLEE McQUEEN, A MINOR,  
SUING BY ALICE M. McQUEEN.  
AS NEXT FRIEND.

Plaintiff,

Vs.

ALVIN CRAWFORD, AS ADMINIS-  
TRATOR OF THE ESTATE OF  
JAMES TERRY TAYLOR, JR.,  
DECEASED,

Defendant.

SUMMONS AND COMPLAINT.

Defendants' address:  
Route 3  
Atmore, Alabama.

TELFAIR J. MASHBURN, JR.

ATTORNEY AT LAW  
BALDWIN COUNTY, ALABAMA

MAY 25 1954

ALICE J. DUCK, Clerk