

2307

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT --IN LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon George S. Lyons to appear within thirty (30) 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 Billie Calendine, a minor, by Aline T. Calendine, his next friend.

Witness my hand this _____ day of July, 1954.

BILLIE CALENDINE, a minor, by Aline T. Calendine, his next friend,	§	
	§	IN THE CIRCUIT COURT OF
Plaintiff	§	BALDWIN COUNTY, ALABAMA
vs.	§	IN LAW
GEORGE S. LYONS,	§	
Defendant	§	

The Plaintiff claims of the defendant, the sum of TWO HUNDRED FIFTY DOLLARS (\$250) for that on heretofore, to-wit: the 22nd day of June, 1954, the defendant so negligently operated a motor vehicle on Alabama Highway 89, a public road in Baldwin County, Alabama, at a point approximately four miles South of the City of Fairhope, Alabama, as to cause or allow the same to run into, upon or against the automobile in which the plaintiff was a passenger, and as a proximate consequence and result of said negligence, the plaintiff suffered bruises and a broken finger all to the damage to the plaintiff as aforesaid, wherefore the plaintiff brings this suit and ask judgment in the above amount.

Billy Calendine
By: Aline T. Calendine
Aline T. Calendine

BILLIE CALENDINE, a minor,
by Aline T. Calendine, his
next friend,

Plaintiff

vs.

GEORGE S. LYONS,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

AGREED STATEMENT OF FACTS

Now comes the Plaintiff and the Defendant in the above styled cause and agree that the following is a true and correct statement of the facts in said case:

On June 22, 1954, at approximately 2:00 p. m., George S. Lyons was driving a 1950 Oldsmobile along Highway 89 in route from Fairhope to Point Clear, to play golf, and while going approximately fifty (50) miles per hour and passing a vehicle which was also going South he veered into the car in which the plaintiff, Billie Calendine, was riding. The plaintiff therefore suffered slight bruises and a broken finger in the accident.

Aline T. Calendine, who filed suit is the next friend of Billie Calendine, is the mother of the plaintiff.

The above being a true and correct statement of the facts in this case, it is hereby agreed upon as such by the parties hereto.

Billie Calendine

By Aline T. Calendine
Aline T. Calendine, his next friend,
plaintiff

James Owens, Jr.
Attorney for Defendant

George S. Lyons, Defendant

BILLIE CALENDINE, a minor,
by Aline T. Calendine, his
next friend,

Plaintiff

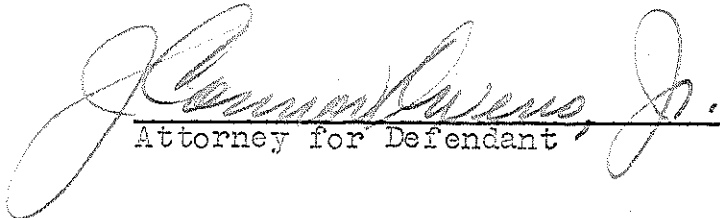
vs.

GEORGE S. LYONS,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW

Comes the Defendant, George S. Lyons, and for answer to
the complaint filed in the said cause, saith: He is not
guilty of the matters alleged therein.


Attorney for Defendant