

2309

AZALEE J. HENDERSON, as Administratrix)
of the Estate of Azalea R. Williams,)
deceased,)

Plaintiff,)

VS.)

AMELIA T. JENKINS AND DAN DAILEY,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

PLEA

Now come the Defendants in the above styled cause and
for plea to the said Complaint heretofore filed in this cause says
as follows:

- 1. Not guilty.

S. H. B. [Signature]
James R. [Signature]
Attorneys for Defendants

AZALEE J. HENDERSON, as Administratrix)
of the Estate of Azalea R. Williams,)
deceased,)

Plaintiff,)

VS)

AMELIA T. JENKINS AND DAN DAILEY,)

Defendants.)

IN THE CIRCUIT COURT OF

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AT LAW

COMPLAINT

Plaintiff claims of the Defendants the sum of, to-wit, Fifteen Hundred Dollars (\$1500.00) as damages, for that, heretofore, on, to-wit, February 27, 1954, a truck of the Defendant, Amelia T. Jenkins, which was then and there being operated by Dan Dailey, who was then and there an agent, servant or employee of the Defendant, Amelia T. Jenkins, and who was then and there acting within the line and scope of his authority as said agent, servant or employee was so negligently operated along a private driveway immediately North of the Jenkins General Store in Loxley, Alabama, that the same was caused to run upon or against Plaintiff's intestate and as a proximate consequence thereof Plaintiff's intestate was so badly injured that she died, all to Plaintiff's damages as aforesaid.

Julius J. Mablebury, Jr.
Attorney for Plaintiff