

2345

MARY PEDONE, by P. F. PEDONE)	
as her next friend,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	
)	BALDWIN COUNTY, ALABAMA
ANN McMILLAN,)	
)	AT LAW
Defendant.)	

C O M P L A I N T

COUNT ONE

Plaintiff, who is a minor child and who sues by her next friend and father, P. F. Pedone, claims of the defendant the sum of Five Hundred Dollars (\$500.00) as damages for that on to-wit: The 15th day of January, 1954 while plaintiff was riding in the automobile of the defendant, as a guest therein, and at a point on a public road in Bay Minette, Baldwin County, Alabama, directly in front of the home of P. F. Pedone and while plaintiff was in the action of leaving the said automobile of the defendant, the said defendant, Ann McMillan, at said time and place willfully and wantonly injured plaintiff by willfully and wantonly running the said automobile against the plaintiff and as a proximate cause of said willful and wanton conduct plaintiff avers that she was caused to sustain, and did sustain the following injuries, to-wit: Her head, limbs and other parts of her body were bruised, strained and injured, she was internally injured; her nevous system was greatly shocked and impaired; she was made sick and sore for a long period of time all to her damages as aforesaid.

Jeffrey G. McMillan, Jr.
Attorney for Plaintiff

FILED
JAN 20 1954
BALDWIN COUNTY, ALA.

MARY PEDONE, by P. F. PEDONE
as her next friend,

VS. Plaintiff,

ANN McMILLAN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

PLEA

Now comes the defendant in the above style cause and for
plea to the complaint heretofore filed in this cause says as
follows:

1. Not guilty.

J. B. Buehler

Sam R. Dean

Attorneys for Defendant