

RUTH STEELE, A Minor, suing by  
D. L. STEELE, as her next friend,

Plaintiff,

vs.

CHARLES S. WHITESPUNNER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO: 2322

PLEA:

Comes now the Defendant in the above styled cause  
and for answer to the Complaint heretofore filed against him, pleads  
as follows:

1. Not guilty.

CHASON & STONE

By: M. J. Stone

RUTH STEELE, A Minor, suing by  
D. L. STEELE, as her next friend,

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CHARLES S. WHITESPUNNER,

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AT LAW

NO: \_\_\_\_\_

COMPLAINT

The Plaintiff claims of the Defendant the sum of Five Hundred and No/100 Dollars (\$500.00) as damages for that on, heretofore, to-wit: May 30, 1951, the Defendant Charles S. Whitespunner, who was then and there acting by and through his agent, servant or employee, Ernest M. Megginson, Jr., who was then and there acting within the line and scope of his said agency, wantonly injured the Plaintiff, Ruth Steele, on Alabama Highway Number 3, a public highway in Baldwin County, Alabama, at a point, to-wit: two miles South of the City Limits of Foley, Alabama, by then and there wantonly driving a motor vehicle in which the said Ruth Steele was then and there riding in such a reckless manner as to lose control of the same and cause the same to overturn; and as a proximate result of which wantonness the said Ruth Steele suffered a severe hematoma of the left hip and was caused to incur, and did incur, medical and hospital bills, all to her damage; wherefore Plaintiff brings this suit and asks judgment in the above amount.

Respectfully submitted,

Deafair J. Massey  
Attorney for the Plaintiff