

SHIRLEY BLACK, a Minor by  
Anna Black, Her Next Friend,

Plaintiff,

vs.

WILBUR RAUSCH and DOROTHY  
RAUSCH,

Defendants.

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*

\* AT LAW  
\*  
\*  
\*  
\*  
\*

2479

NOW comes the Defendants in the above entitled cause,  
separately and severally, and file the following separate  
and several pleas to the Plaintiff's complaint:

1. The Defendants are not guilty of the matters and  
things alleged therein.

2. The Defendants deny each and every material allega-  
tion of the Plaintiff's complaint.

Inge Twitty Armbricht Jackson  
Attorneys for the Defendants.

FILED

12-17-54

ALICE J. BORN, Clerk

December 17, 1954,  
Service accepted  
Inge Twitty Armbricht Jackson  
attorneys

SHIRLEY BLACK, a Minor, by  
ANNA BLACK, Her Next Friend,

Plaintiff,

vs.

WILBUR RAUSCH and DOROTHY  
RAUSCH,

Defendants.

\* IN THE CIRCUIT COURT OF

\*

BALDWIN COUNTY, ALABAMA

\*

\*

AT LAW

\*

\*

\*

\*

C O M P L A I N T

The plaintiff, Shirley Black, suing by her mother and next friend, Anna Black, claims of the defendants FIVE HUNDRED (\$500.00) DOLLARS as damages for that on, to-wit, the 10th day of June, 1954, the plaintiff was crossing Alabama Highway No. 89, a public highway, near the west end of Lillian Bridge in Baldwin County, Alabama, and the defendant, Dorothy Rausch, the agent, servant or employee of the defendant, Wilbur Rausch, acting within the line and scope of her employment, so negligently operated an automobile on said Alabama Highway No. 89 as to cause or allow said automobile to run upon or against the plaintiff, and as a proximate result of said negligence the plaintiff received severe injuries in this, to-wit, she was bruised and lacerated; she was cut and scarred on her chin; her jaw was injured; her lip was cut and she suffered great mental anguish and physical pain for all of which she claims damages, hence this suit.

*[Signature]*  
Attorney for Plaintiff.

FILED

12-17-54

ALICE J. DUCK, Clerk

*Service accepted*  
*12/17/54*  
*M. J. DeMurray*