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C. LeNOIR THOMPSON

Attorney-At-Law

BAY MINETTE, ALABAMA

PHONES : 5941
5672

January 24, 1955

Mrs. Alice J. Duck
Clerk of the Circuit Court
~~Bay Minette, Alabama~~

re: C. LeNOIR THOMPSON as father and
next friend of CHARLES LeNOIR
THOMPSON II

VS

C. V. DANIELS and MRS. LOUNETTE
JONES also known as MRS. ADOLPHUS
JONES.

Dear Mrs. Duck:

Please dismiss the above styled cause and advise me the amount of
the cost.

Sincerely,



CLT/lh

STATE OF ALABAMA
BALDWIN COUNTY

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TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon O. V. Daniels and Mrs. Lounette Jones also known as Mrs. Adolphus Jones to appear within thirty 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 C. LeNoir Thompson as father and next friend of Charles LeNoir Thompson II.

WITNESS my hand, this 5th day of January, 1955.

Archie L. Rouse
Clerk.

Filed
1-5-55
Clara J. Black, Clerk

Plaintiff demands trial

by jury.

C. Lenoir Thompson as father and next
friend of Charles Lenoir Thompson II.

Plaintiff claims of the Defendants the sum of Five Thousand (\$5,000.00) Dollars as damages for assault and battery committed by Mrs. Lounette Jones also known as Mrs. Adolphus Jones while in the line and scope of her employment as an agent, servant or employee of C. V. Daniels, principal of the Bay Minette Elementary School and with the knowledge of the said C. V. Daniels, the plaintiff alleges that said defendant Mrs. Lounette Jones also known as Mrs. Adolphus Jones did on said date wrongfully and unlawfully beat, cruelly treat, bruise, wound and injure plaintiff, a child of tender years and as a proximate consequence thereof, he was made sick and sore and suffered lacerations to the back of his neck and about his spine, he suffered mental pain and anguish, indignities, fright and injuries to his feelings all to his damage as aforesaid. Hence this suit.

2.

Plaintiff claims of the Defendants the sum of Five Thousand (\$5,000.00) Dollars as damages for assault and battery committed by Mrs. Lounette Jones also known as Mrs. Adolphus Jones while in the line and scope of her employment as an agent, servant or employee of C. V. Daniels, principal of the Bay Minette Elementary School and with the knowledge of the said C. V. Daniels, the plaintiff alleges that said defendant Mrs. Lounette Jones also known as Mrs. Adolphus Jones did on said date wrongfully and unlawfully beat, cruelly treat, bruise, wound and injure plaintiff, a child of tender years and as a proximate consequence thereof, he was made sick and sore and suffered bruises and contusions on his hands and forearms resulting in swelling to the extent that he was unable to do his piano practice; and he suffered mental pain and anguish, indignities, humiliations, fright and injuries to his feelings all to his damage as aforesaid. Hence this suit.

1.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

C. LENOIR THOMPSON as father and
next friend of CHARLES LENOIR
THOMPSON II
COMPLAINANT
VS
C. V. DANIELS and MRS. LOUNETTE
JONES also known as MRS. ADOLPHUS
JONES
RESPONDENTS

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