

BARBARA LOUISE HALL, a Minor,  
suing by Clark Y. Hall, Jr., as  
her next friend,

Plaintiff,

vs.

STALLWORTH TURPENTINE COMPANY,

Defendant.

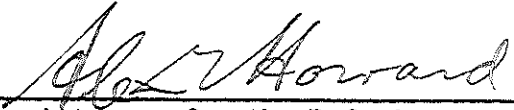
\* In the Circuit Court of  
\* Baldwin County, Alabama

\* At Law

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Now comes the defendant and, for answer to the complaint,  
pleads in short by consent the general issue.

  
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Attorney for the Defendant.

FILED

Oct. 18, 1955

ALICE I. DUCK, Clerk


STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Stallworth Turpentine Company 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 Barbara Louise Hall, a Minor, suing by Clark Y. Hall, Jr., as her next friend.

Witness my hand this 11 day of October, 1955.

  
Clerk.

BARBARA LOUISE HALL,  
a Minor, suing by Clark  
Y. Hall, Jr., as her next  
friend,

Plaintiff,

vs.

STALLWORTH TURPENTINE  
COMPANY,

Defendant.

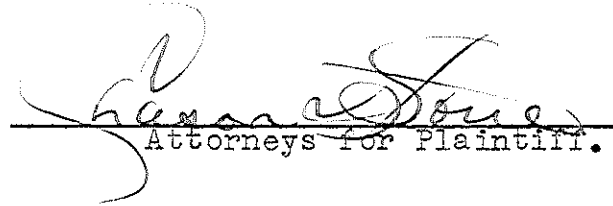
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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) as damages, for that on, to-wit: March 26, 1955, the Defendant acting by and through its agent, servant or employee, who was then and there acting within the line and scope of his authority as such agent, servant or employee negligently drove an automotive truck into, upon or against the automobile in which the Plaintiff, Barbara Louise Hall, was then and there riding along a public highway, a graveled road in Tensaw, in Baldwin County, Alabama, at a point near the Baptist Church, and as a proximate result of the negligence of

such Defendant the said Barbara Louise Hall was injured in this:  
she was bruised and made sore and wasshaken up internally so that  
she was caused to have a premature delivery of a baby with which she  
was then pregnant, all to the damage of the Plaintiff in the sum  
aforementioned.

  
Attorneys for Plaintiff.