

2927

LILLY BELL STEWART, as
Administratrix of the Estate
of Pete Stewart, deceased,

Plaintiff,

vs.

CECIL E. BARBAROW,

Defendant.


IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Defendant in the above styled cause and for
plea to the complaint filed in said cause says:

1. That the allegations of the complaint are untrue.
2. That at the time and place alleged in the complaint
the Plaintiff's Intestate was himself guilty of negligence which
proximately contributed to his injuries in that he negligently
walked in front of the automobile driven by the Defendant, when
such automobile was passing him on such highway, thereby contribut-
ing to his injuries.


Attorneys for the Defendant

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Cecil E. Barbarow 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 Lilly Bell Stewart, as administratrix of the Estate of Pete Stewart, Deceased.

Witness my hand this 15th day of May, 1956.

Alice J. Duck
Clerk.

LILLY BELL STEWART, as
Administratrix of the Estate
of Pete Stewart, deceased,

Plaintiff,

vs.

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IN THE CIRCUIT COURT OF

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The Plaintiff claims of the Defendant the sum of Three Thousand Dollars (\$3,000.00) as damages for that on, to-wit: the 5th day of March, 1956, the Defendant, Cecil E. Barbarow so negligently operated a motor vehicle on a public highway in Baldwin County Alabama known as the Perdido, Rabun, Bay Minette Road, at a point about 10 miles North of Bay Minette, Alabama, as to cause such motor vehicle to run into, upon or against the Plaintiff's Intestate, Pete Stewart, who was then and there walking along or across said highway and as a proximate result of the Defendants negligence, the Plaintiff's Intestate suffered injuries from which he died, all to the damage of the Plaintiff, wherefore Plaintiff brings this suit and asks judgment in the above amount.

W. L. Thompson
Attorney for the Plaintiff