

Leon Clemmons, a Minor  
by O. O. Clemmons, His  
Next Friend, Plaintiff

Vs.

James W. Lewis and  
H. R. Maddox  
Defendants

In the Circuit Court of  
Baldwin County, Alabama  
At Law

2985


## COMPLAINT

### I.

The plaintiff, Leon Clemmons, suing by his father and next friend, O. O. Clemmons, claims of the defendant, James W. Lewis, the sum of FOUR HUNDRED NINETY-FIVE and NO/100 (\$495.00) DOLLARS as damages for that on heretofore, to-wit: the 13th day of May, 1956, the plaintiff was sitting in an automobile lawfully halted and parked in a lawfully designated public parking area at the south end of Alabama Highway 3 at or near Gulf Shores, Alabama, in Baldwin County, Alabama, where he had a lawful right to be, and the said defendant, James W. Lewis, acting by and through his agent or servant, H. R. Maddox, so operated his automobile with willful and wanton negligence in such a manner as to cause or allow the same to run into, upon or against the automobile in which the plaintiff was sitting, and as a proximate result of such willful and wanton negligence the plaintiff received severe injuries in that, to wit: he was bruised, cut and lacerated about the head; he suffered four fractured teeth; and he suffered great mental anguish and physical pain for all of which he claims damages, hence this suit.

### II.

The plaintiff, suing by his father and next friend, O. O. Clemmons, claims of the defendant, H. R. Maddox the sum of FOUR HUNDRED NINETY-FIVE and NO/100 (\$495.00) DOLLARS as damages for that on heretofore, to wit: the 13th day of May, 1956, the plaintiff was sitting in an automobile lawfully halted and parked in a lawfully designated public parking area at the south end of Alabama Highway 3 at or near Gulf Shores, Alabama, in Baldwin County, Alabama, where he had a lawful right to be and the said defendant, H. R. Maddox, so operated an automobile with willful and wanton negligence in such a manner as to cause or allow the same to run into, upon or against the automobile in which the plaintiff was sitting, and as a proximate result of such willful and wanton negligence the plaintiff received severe injuries in that, to wit: he was bruised, cut and lacerated about his head; he suffered four fractured teeth; and he suffered great mental anguish and physical pain for all of which he claims damages, hence this suit.

  
Attorney for Plaintiff

2983'

RECORDED

FILED  
JUL 24 1956  
WILLIAM C. CRICK, CLERK

JAMES A. BRICE

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Baldwin County, Alabama  
At Law

Vs.

James W. Lewis and  
H. R. Maddox  
Defendants

NOW come 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 allegation of the Plaintiff's complaint.

Attorney for the Defendants