

HAROLD LEON GIVENS, a
minor, by his next friend,
Thomas Givens, Sr.,

Plaintiff

vs.

C. R. DOLPH,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW NO. 3826.

Plaintiff claims of the defendant the sum of FIVE HUNDRED(\$500.00)DOLLARS for that on heretofore, to-wit: the 12th day of June, 1956, the plaintiff was a passenger in an automobile, said automobile being operated by the plaintiff's father on U. S. Highway #90, a public road in Baldwin County, Alabama, at a point nine(9)miles east of Robertsdale, Alabama, and at the same time and at the same place, the defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against the automobile in which the plaintiff was riding so that the plaintiff received contusions about the chest, lacerations upon his forehead and upper chest, and to become sore and stiff, and said injuries and damages to the plaintiff were the proximate consequence of the negligence of the defendant aforesaid, hence this suit.


Attorney for Plaintiff

RECORDED

IN THE CIRCUIT COURT OF
BAIDWIN COUNTY, ALABAMA
IN LAW. NO. 3076

Harold Leon Givens, a minor,
by his next friend, Thomas
Givens, Sr.

Plaintiff

vs.

C. R. Dolph,

Defendant

SUMMONS AND COMPLAINT

FILED

SEP 6 1956

ALICE J. DUCK, Clerk

JAMES A. HENDRIX
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

J. J. Owens, Jr.
Attorney for Defendant
C. R. Dolph, hereby
accept service
of this complaint.
Wated at Mobile
this the 6 day of Sept.,
1956.
James Owens, Jr.

HAROLD LEON GIVENS, a
minor, by his next friend,
Thomas Givens, Sr.,

Plaintiff

vs.

C. R. DOLPH,

Defendant

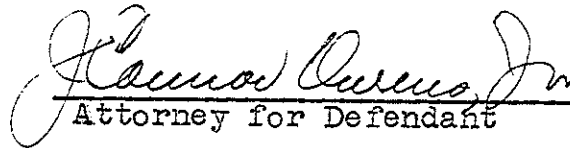
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW NO. 3026.

ANSWER

Comes the defendant, C. R. Dolph, and for answer to the
complaint filed in the said cause, saith: He is not guilty
of the matters alleged therein.


Attorney for Defendant

HAROLD LEON GIVENS, a
minor, by his next friend,
Thomas Givens, Sr.,

Plaintiff

vs.

C. R. DOLPH,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. 3026.

AGREED STATEMENT OF FACTS

Now comes the plaintiff and the defendant in the above styled cause and agree that the following is a true and correct statement of the facts in the said case:

On June 12, 1956, the defendant, C. R. Dolph, was operating his automobile on Highway #90, about nine(9) miles east of Robertsedale, Alabama. That at the same time and at the same place, the plaintiff was a passenger in his father's car. The said Thomas Givens, Sr., the father of the plaintiff was slowing his vehicle, a 1956 Chevrolet 1½ ton pickup. That the defendant was operating a 1953 Plymouth-four door- and he collided with the right of the said pickup. As a result of said collision, the plaintiff received contusions about the chest, lacerations upon his forehead and upper chest, and became sore and stiff. That said accident occurred about 11:00 a. m. The plaintiff suffered to the extent as stated herein, and received no permanent injury from said accident.

Thomas Givens Sr
Thomas Givens, Sr.

James C. Thadrip
Attorney for the Plaintiff

James Owens, Jr.
Attorney for Defendant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3026

September TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon C. R. Dolph

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

C. R. Dolph, Defendant

by Harold Leon Givens, a minor, by his next friend, Thomas Givens, Sr.

Plaintiff

Witness my hand this 6th day of September 1956.

Alfred J. Dwyer, Clerk