

JOHN D. TRIONE, as father
and next of friend of
PATRICIA ANN TRIONE, a
minor,

PLAINTIFF

VS

DENNIS SMITHERMAN

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant in the above styled cause and for answer to
the Plaintiff's Complaint says that he is not guilty of the matters alleged
therein.

Walters & Brantley

BY:

Robert M Brantley
Attorneys for the Defendant

STATE OF ALABAMA X
BALDWIN COUNTY X

IN THE CIRCUIT COURT - AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Dennis Smitherman 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 the same, then and there to answer the complaint of John D. Trione, as the father and next friend of Patricia Ann Trione, a minor.

Witness my hand this 2 day of May, 1957.

Reese J. Smith
Clerk

JOHN D. TRIONE, as the father
and next friend of PATRICIA
ANN TRIONE, a minor,

Plaintiff,

vs.

DENNIS SMITHERMAN,

Defendant.

X
X
X
X
X
X
X
X
X

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 16, 1957, the Defendant so negligently operated a motor vehicle on U. S. Highway 98, at a point in front of the postoffice in Montrose, Alabama, in Baldwin County, Alabama, as to drive such automobile into, upon or against an automobile in which the said Patricia Ann Trione was riding at said time and place and as a proximate result of the negligence of such Defendant the said Patricia Ann Trione was injured in this: she had abraisions and lacerations on her forehead, a wound on her chin and an injury to her right thumb and she was otherwise bruised and made sore. And the Plaintiff avers that the negligence of the Defendant was the proximate cause of such injuries, wherefore Plaintiff brings suit and asks judgment in the above amount.

Chas. E. Stone
Attorneys for Plaintiff

RECORDED 32-33

SUMMONS & COMPLAINT

JOHN D. TRIONE, as the father
and next of kin of PATRICIA
ANN TRIONE, a minor,

Plaintiff,

vs.

DENNIS SMITHERMAN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAY 2 1957

ALICE A. BUCK, Clerk

LAW OFFICES

CHASON & STONE
BAY MINETTE, ALABAMA

I, Albert M. Brantley,
an attorney for
Dennis Smitherman,
hereby accept
service of the
within Complaint
this the 2nd day
of May, 1957

Albert M. Brantley