

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 Sylvester Pugh 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 Danny Brown, a minor, suing by his father and next friend, James D. Brown.

Witness my hand this the 16 day of September, 1957.


Beice Forester  
CLERK

DANNY BROWN, a minor, suing by )  
his father and next friend, )  
JAMES D. BROWN, )  
Plaintiff )  
VERSUS )  
SYLVESTER PUGH, )  
Defendant )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

The Plaintiff claims of the Defendant the sum of Fifteen Thousand (\$15,000.00) Dollars as damages for that on, to-wit, the 23rd day of June, 1957, on Highway #98, a public road in Baldwin County, Alabama, at or near the intersection of Highway #98 (North Section Street) and Pensacola Street, which point is located in Fairhope, Baldwin County, Alabama, the Defendant, Sylvester Pugh, so negligently operated a motor vehicle, to-wit, a motorcycle, as to cause or allow the same to run into, upon or against a motor vehicle, to-wit, a motorbike, on which the Plaintiff was then and there riding as a passenger; and the Plaintiff alleges that as a proximate consequence of the negligence of the Defendant, Sylvester Pugh, aforesaid, that the Plaintiff was caused to suffer and did suffer personal injuries in this: he was bruised about the face and body, he was made sick and sore, he was knocked unconscious, he suffered a severe fracture of the skull, he was caused to suffer

much physical pain and mental anguish, his head and back were injured, he was caused to be permanently injured; and the Plaintiff was caused to expend large sums in and about the care and treatment of the injuries; all to the damage of the Plaintiff as aforesaid; wherefore he brings this suit and asks judgment in the above amount.

  
ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial  
of this cause by jury.

  
ATTORNEY FOR PLAINTIFF

ADDRESS:

Mr. Sylvester Pugh  
409 St. Joseph Street  
Mobile, Alabama

OR

Grand Trailer Court  
Plateau, Alabama

DANNY BROWN, a minor, suing by  
his father and next friend,  
JAMES D. BROWN,  
Plaintiff  
versus  
SYLVESTER PUGH,  
Defendant

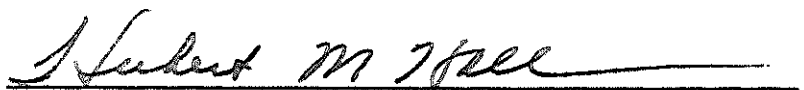
: IN THE CIRCUIT COURT OF  
:  
BALDWIN COUNTY, ALABAMA.  
:  
:  
AT LAW  
:  
NO. 3330  
:

JUDGMENT

This day came the parties by their attorneys and by the agreement by the parties, in open court, the demand for jury trial heretofore made was waived and this cause was specially set for hearing by the court on this day and issues having been joined between the parties the court proceeded to hear the matter, and having heard and considered the facts, finds that the plaintiff is entitled to recover as damages from the defendant the sum of FIVE HUNDRED DOLLARS (\$500.00).

It is, therefore, CONSIDERED, ORDERED, and ADJUDGED by the Court that the plaintiff have and recover of the defendant the sum of FIVE HUNDRED DOLLARS (\$500.00), together with the costs in this behalf expended, and for all of which execution may issue.

DONE at Bay Minette, Alabama, this the 6 day of March,  
1958.

  
HUBERT M. HALL  
CIRCUIT JUDGE

DANNY BROWN, a minor, suing by : IN THE CIRCUIT COURT OF  
his father and next friend, :  
JAMES D. BROWN, :  
Plaintiff : BALDWIN COUNTY, ALABAMA.  
  
versus : AT LAW  
  
SYLVESTER PUGH, :  
Defendant : NO. 3330

A N S W E R

Comes the defendant in the above styled cause and for answer  
to the plaintiff's complaint files the following plea:

ONE

Not guilty.

HAND, ARENDALL & BEDSOLE

By W B Hand

Myer Perloff  
Myer Perloff

Attorneys for the Defendant