

3797

WILLIAM JAMES MAIR, A MINOR	X	
WHO SUES BY HIS NEXT FRIEND	X	
AND FATHER, ALEXANDER MAIR,	X	IN THE CIRCUIT COURT OF
	X	
Plaintiff,	X	
	X	BALDWIN COUNTY, ALABAMA
vs.	X	
	X	
JOHN EDMUNDSON AND ELEANOR	X	AT LAW
J. EDMUNDSON,	X	
	X	
Defendants.	X	

Come the Defendants in the above styled cause and for plea
to the complaint filed in said cause, says:

1. Not guilty.


Attorneys for Defendants

STATE OF ALABAMA)
BALDWIN COUNTY }

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOHN EDMUNDSON and ELEANOR J. EDMUNDSON to appear and plead, answer or demur, within thirty days from the service hereof, to a Bill of Complaint filed in the Circuit Court, at Law, for said state and county, against them by William James Mair, a minor, who sues by his next friend and father, Alexander Mair.

Herein fail not. Due return of this writ make as the law directs.

Witness my hand this the 20 day of March, 1959.

[Signature]
CLERK

WILLIAM JAMES MAIR, A MINOR,
WHO SUES BY HIS NEXT FRIEND
AND FATHER, ALEXANDER MAIR,

PLAINTIFF

VS.

JOHN EDMUNDSON AND ELEANOR
J. EDMUNDSON,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

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COUNT ONE:

The Plaintiff, William James Mair, a minor, who sues by his next friend and father, Alexander Mair, claims of the Defendants the sum of Five Hundred (\$500.00) Dollars as damages for this, to-wit: That on, to-wit, the 10th day of October, 1958, the Plaintiff, who was then a minor of sum sixteen years of age, was on Highway #98, a public throughfare in the City of Fairhope, Baldwin County, Alabama, at or near a point some 150 yards South of Fairwood Boulevard, a place where he had a right to be, and at said time and place, the Defendant, John Edmundson, so negligently drove an automobile owned by the Defendant, Eleanor J. Edmundson, that it was caused to collide with the person of the Plaintiff, William James Mair, and as proximate consequence of such negligence, the Plaintiff was made sick and sore and received a compound fracture of his lower leg, and suffered much pain, all the Plaintiff's damage in the amount aforesaid, hence this suit.

[Signature]
ATTORNEY FOR PLAINTIFF