

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 Louis Hanak and Mattie L. Hanak 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 George H. Allen as the father and next friend of David V. Allen, a minor.

Witness my hand on this the 13 day of April, 1959.

3810

Rebecca L. Hanak
Clerk.

GEORGE H. ALLEN, as the
father and next friend of
DAVID V. ALLEN, a minor,

Plaintiff,

vs.

LOUIS HANAK AND MATTIE L.
HANAK,

Defendants.

X

X

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X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

The Plaintiff claims of the Defendants the sum of Five Hundred Dollars (\$500.00) as damages for that, on-to-wit: October 21, 1958, at a point on U. S. Highway 31 where it is intersected by Alabama Highway 59 in Stapleton, Baldwin County, Alabama, the Defendant Mattie L. Hanak, who was then and there the agent, servant or employee of the Defendant Louis Hanak and acting within the line and scope of her employment as such, negligently drove an automobile belonging to the said Louis Hanak into, upon or against an automobile being driven by George H. Allen in which the said David V. Allen was then and there riding and as a proximate result of the negligence of such Defendants the said David V. Allen was injured in this: He sustained fractures of both femurs and the right tibia

and fibula and he had multiple contusions and abraisions, all to the damage of the said David V. Allen in the sume hereinabove set out.

Filed
April 13, 1959
Clare J. Clark,
clerk

J. Conrad Owen, Jr.
Attorney for Plaintiff

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FILED
APR 13 1959
ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

Before me, *Alice J. Duck*, a Notary Public, in and for said County in said State, personally appeared George H. Allen and Wilma J. Allen, his wife, who are known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That their names are George H. Allen and Wilma J. Allen and they are both over the age of twenty-one years and are resident citizens of Mobile, Alabama, residing at 602 Thornton Place. That they are the father and mother of David V. Allen, a minor son who is now two years of age. That the said David V. Allen resides with them at the above address and the said David V. Allen does not have a general guardian appointed by any court. That Alice J. Duck as Clerk of the Circuit Court of Baldwin County, Alabama, now holds for the said David V. Allen the sum of Five Hundred Dollars (\$500.00) recovered under a suit filed in the Circuit Court of Baldwin County, by George H. Allen as the father and next friend of David V. Allen, a minor, against Louis Hanak and Mattie L. Hanak. That such judgment was recovered on this day and such judgment has this day been paid by the Defendants to the said Alice J. Duck as such Clerk.

Under the provisions of Title 21, Section 99 of the 1940 Code of Alabama, as amended, such Clerk is authorized to pay the amount of such judgment, not to exceed Five Hundred Dollars (\$500.00) to the Judge of Probate of the County in which said minor resides. That Vernol R. Jansen is now the Probate Judge of Mobile County, Alabama, the County in which such minor resides and affiants request that the said Alice J. Duck shall pay the amount now held by her for such minor to such judge.

George H. Allen

Sworn to and subscribed before me on this the 13th day of April, 1959.

Wilma J. Allen

Alice J. Duck
Notary Public, Baldwin County, Alabama

Filed April 13, 1959
Alice J. Duck, Clerk

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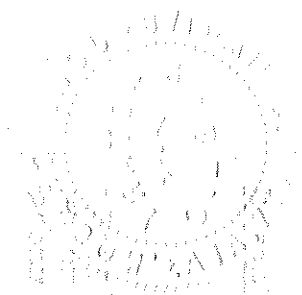
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REGISTER



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DAVID V. ALLEN, a minor,

Plaintiff,

vs.

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HANAK,

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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

1. Not guilty.

Filed April
13, 1959


Attorneys for Defendants

3810

FILED

APR 13 1959

ALICE J. DUCK, CLERK
REGISTER