

(3971)

RE: :
ESTATE OF ROBERT HOWARD :
TAYLOR, A MINOR : IN THE PROBATE COURT
EX PARTE: : CLARKE COUNTY, ALABAMA
OLLICE FOSCUE HARE :
:::

This day came Ollice Foscue Hare, a resident of Clarke County, Alabama, and filed his petition in writing, verified by affidavit, alleging that he is indebted to Robert Howard Taylor, a minor, approximately nine years of age, who is a non-resident of Alabama, residing in Pensacola, Florida, with his father, Doy H. Taylor; that said indebtedness is in the sum of Five Hundred (\$500.00) Dollars, for personal injuries suffered by said minor in an automobile collision which occurred on to-wit: June 11, 1959, in Baldwin County, Alabama, for which judgment has been or is about to be taken in the Circuit Court of Baldwin County, Alabama, for said sum of \$500.00 against the said Ollice Foscue Hare, in a suit filed against him in said court by said minor, by his father and next friend, Doy H. Taylor; and the undersigned, as Judge of Probate of Clarke County, Alabama, does hereby acknowledge that he has received from the said Ollice Foscue Hare the sum of \$500.00, which payment is claimed to be made in satisfaction of the aforesaid judgment.

This the 9 day of September, 1959.


Judge of Probate

FILED
SEP 10 1959

ALICE J. DUCK, Clerk

OLLYCE FOSCUE HARE,
Defendant.

● ● ●

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

1. That the matters therein alleged are all untrue.
2. That he is not guilty of the matters therein alleged.

ALICE J. DUCK, CLERK
REGISTER

By John E. Anderson
Attorneys for Defendant

ROBERT HOWARD TAYLOR, a minor,
who sues by his father and
next friend, DOY H. TAYLOR,
Plaintiff,

vs.

OLLICE FOSCUE HARE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

..AT LAW

PLEAS

110 120 130 140 150 160 170 180 190 200 210 220 230 240 250 260 270 280 290 300 310 320 330 340 350 360 370 380 390 400 410 420 430 440 450 460 470 480 490 500 510 520 530 540 550 560 570 580 590 600 610 620 630 640 650 660 670 680 690 700 710 720 730 740 750 760 770 780 790 800 810 820 830 840 850 860 870 880 890 900 910 920 930 940 950 960 970 980 990 1000

STATE OF ALABAMA

BALDWIN COUNTY

X
X
X

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ollice Foscue Hare 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 Robert Howard Taylor, a minor, who sues by his father and next friend, Doy H. Taylor.

Witness my hand this 10 day of September, 1959.

Alice J. Duck
Clerk

ROBERT HOWARD TAYLOR, a minor,
who sues by his father and next
friend, DOY H. TAYLOR,

Plaintiff,

vs.

OLLICE FOSCUE HARE,

Defendant.

X
X
X
X
X
X
X

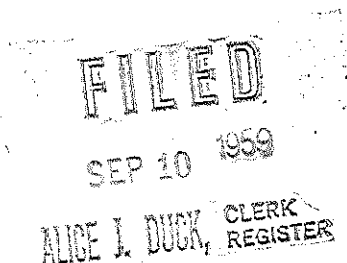
IN THE CIRCUIT COURT OF

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: June 11, 1959, at a point on Alabama Highway 59 about 1.7 miles North of Blacksher, Baldwin County, Alabama, the Defendant negligently drove his jeep into, upon or against an automobile in which the said Robert Howard Taylor, a minor nine (9) years of age, was riding at said time and place and as a proximate result of the negligence of such Defendant the said Robert Howard Taylor was injured in this: he received a severe concussion and he received contusions of the left leg and was caused to remain in bed for about two weeks, and the Plaintiff avers that the negligence of such Defendant was the proximate cause of such injuries and damages, hence this suit.



James & Stone
Attorneys for Plaintiff

3971

ROBERT HOWARD TAYLOR, a minor,
who sues by his father and next
friend, DOY H. TAYLOR,

Plaintiff,

VS.

OLLICE FOSCUE HARE,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA