

A. J. HOOVER as father)
of BARBARA ANN HOOVER,)
a minor, deceased.)
Plaintiff)
VS.)
JOHN W. MEACHAM, III)
Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. 4396

The plaintiff, suing as the father of Barbara Ann Hoover, a minor under the age of twenty-one years, deceased, claims of the defendant the sum of \$6,500.00 damages for that heretofore, on to-wit: June 9, 1960, the deceased Barbara Ann Hoover, a minor daughter of the plaintiff, under twenty-one years of age was riding in an automobile upon U. S. Highway 98 at or near the intersection with Baldwin County Road 95 in Baldwin County, Alabama, both of which are public roads, and then and there the defendant negligently and unlawfully drove an automobile into, upon or against the automobile in which the said deceased Barbara Ann Hoover was then riding, and thereby and as the proximate result and consequence thereof the plaintiff's said daughter was pinioned in the resulting wreckage, and was injured and killed for which the plaintiff claims damages as aforesaid.

FILED

AUG 22 1960

ALEX J. DUK, CLERK
REGISTER

Arthur C. Epperson
Attorney for the Plaintiff

ANDREW JACKSON HOOVER,
as father of BARBARA ANN
HOOVER, a minor, deceased,

Plaintiff,

Vs

JOHN W. MEACHAM, 111

Defendant.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW

) NO 4396

Comes now the defendant through Lyons, Pipes and Cook, his attorneys, and enters this his appearance in this cause, and for answer to the plaintiff's complaint, says as follows:

1. That he is not guilty.

FILED

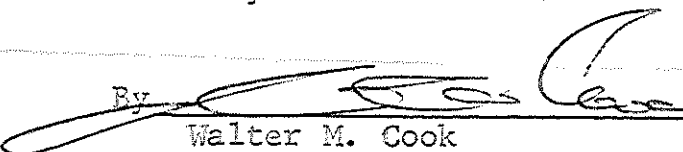
AUG 22 1960

ALICE J. DUCK,

CLERK
REGISTER

LYONS, PIPES AND COOK
Attorneys for Defendant

By


Walter M. Cook

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4396

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon JOHN W. MEACHAM, III

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against -----

JOHN W. MEACHAM, III -----, Defendant-----

by A. J. HOOVER as father of BARBARA ANN HOOVER, a minor.-----
deceased.-----, Plaintiff-----

Witness my hand this 22nd day of August, 1960

Alice J. [Signature] -----, Clerk

No.

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19__

19

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff.

Deputy Sheriff.

ANDREW JACKSON HOOVER,
as father of BARBARA ANN
HOOVER, a minor, deceased,

Plaintiff,

Vs

JOHN W. MEACHAM, III

Defendant.

IN THE CIRCUIT COURT OF
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AT LAW

NO

Comes now the defendant through Lyons, Pipes and Cook, his
attorneys, and enters this his appearance in this cause, and for answer
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1. That he is not guilty.

LYONS, PIPES AND COOK
Attorneys for Defendant

By

Walter M. Cook