

C. C. HOOVER, a minor by
A. J. HOOVER, as his father
and next friend.

PLAINTIFF

VS.

JOHN W. MEACHAM, III

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

NO.

4397

The plaintiff, a minor nine years of age, who sues by his father and next friend, A. J. Hoover, claims of the defendant the sum of \$6,000.00 as damages for that heretofore on, to-wit: June 9, 1960, the plaintiff was a minor nine years of age riding as a passenger in his father's automobile, which said automobile was being lawfully operated along and upon a public highway in Baldwin County, Alabama, on to-wit: U. S. Highway 98 at or near the intersection of U. S. Highway 98 and Baldwin County Road 95, and while said automobile was being driven along said U. S. Highway 98 an automobile, which was being driven by the defendant negligently and unlawfully, ran upon, over or against the automobile in which the plaintiff was a passenger at or near said intersection of U. S. 98 and County Road 95 causing said automobile in which the plaintiff was riding to turn over and wreck and the plaintiff avers that as a proximate ~~XXXXX~~ consequence of the negligence and unlawful operation of the car ~~XXXXXX~~ by the defendant in running into, upon, over or against the car in which the plaintiff was a passenger, the plaintiff suffered severe personal injuries to-wit: he was knocked unconscious; he suffered shock; he was bruised and lacerated about the arms, legs and body; he was internally injured; both of his legs were broken; his left collar bone was broken; he was permanently injured; he suffered and continues to suffer great pain and anguish, mentally and physically, for all of which he claims damages as aforesaid.

FILED

AUG 22 1960

AUGUST J. DUCK, CLERK
REGISTER

Arthur C. Epperson

Attorney for the plaintiff

CHARLES C. HOOVER, a minor,)	IN THE CIRCUIT COURT OF
by ANDREW JACKSON HOOVER, as)	BALDWIN COUNTY, ALABAMA
father and next friend,)	
Plaintiff,)	AT LAW
Vs)	
JOHN W. MEACHAM, 111)	
Defendant.)	No _____

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.

LYONS, PIPES AND COOK
Attorneys for Defendant

By _____

Walter M. Cook

FILED
AUG 22 1930
ALICE L. DUCK, CLERK
REGISTER

CHARLES C. HOOVER, a minor,
by ANDREW JACKSON HOOVER, as
father and next friend,

Plaintiff,

Vs

JOHN W. MEACHAM, 111

Defendant.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) 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 to the plaintiff's complaint, says as follows:

1. That he is not guilty.

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.-----

-----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 C. C. HOOVER, a minor by A. J. HOOVER, as his father and
next friend. -----, Plaintiff-----

Witness my hand this 22nd ----- day of August ----- 1960.

Cliff J. Neuse -----, Clerk

No. _____ Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 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.