

MARGARET JEAN HOOVER  
a minor by A. J. HOOVER  
as father and next friend.

Plaintiff

VS

JOHN W. MEACHAM, III

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA


AT LAW

No. 4398

The plaintiff, a minor six years of age, who sues by her father and next friend, A. J. Hoover, claims of the defendant \$3,000.00 as damages for that heretofore on, to-wit: a minor six years of age June 9, 1960, the plaintiff was/riding in an automobile upon U. S. Highway 98 at or near its intersection with Baldwin County Road 95, both of which are public-roads in Baldwin County, Alabama, and then and there the defendant negligently and unlawfully drove another automobile into, upon or against the automobile in which the plaintiff was riding, and thereby and as the proximate result and consequence thereof, the plaintiff received severe personal injuries in this, to-wit:

She was knocked unconscious; she suffered severe concussion of the brain; she suffered multiple wounds and bruises of the head and body; she was caused to suffer great physical and mental pain and anguish; she was internally injured for all of which she claims damages as aforesaid.

FILED  
AUG 22 1960  
ALICE J. DUCK, CLERK  
REGISTER

  
Attorney for the Plaintiff

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 MARGARET JEAN HOOVER, a minor, by A. J. HOOVER as  
father and next friend.

-----, Plaintiff-----

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

Cliff Hooch, Clerk

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.

MARGARET JEAN HOOVER, a minor,  
by ANDREW JACKSON HOOVER, as  
father and next friend,

Plaintiff,

Vs

JOHN W. MEACHAM, III

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

FILED

AUG 22 1960

ALICE J. DUCK, CLERK  
REGISTER

MARGARET JEAN HOOVER, a minor,  
by ANDREW JACKSON HOOVER, as  
father and next friend,

Plaintiff,

Vs

JOHN W. MEACHAM, III

Defendant.

) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA

) AT LAW

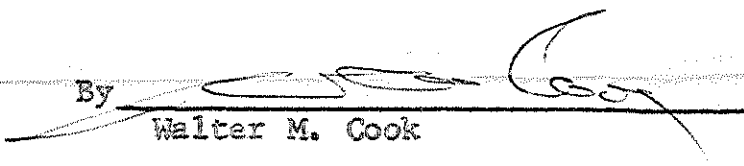
) NO \_\_\_\_\_

Comes now the defendant through Lyons, Pipes and Cook, his  
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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