CAROLYN BAILEY, a minor By her Father and next		
friend, Earl H. Bailey	. 🗴	IN THE CIRCUIT COURT OF
	intiff ≬	BALDWIN COUNTY, ALABAMA
VS	_	AT LAW
BETTY DEVINE and	Q	4404)
L. S. DEVINE Def	) endants	
	Q	

### COMPLAINT

The Plaintiff claims of the Defendants the sum of FIVE HUNDRED DOLLARS (\$500.00) as damages for; that on to-wit, the 18th day of July, 1959, the Defendant, BETTY DEVINE, did injure said Plaintiff, by willfully or wantonly running the car in which she was driving and which Plaintiff was riding off the road on U. S. Highway Ninety (90), approximately eight (8) miles North of Robertsdale, Baldwin County, Alabama. At said time and place BETTY DEVINE was the servant or agent of L. S. DEVINE and was acting in the line and scope of her authority as such servant and that as the proximate result of said willfully or wantonly conduct aforesaid, the Plaintiff was injured in that her face was lacerated and she was bruised and suffered great pain and was caused to expend much money for medical expenses and was made sick, sore and lame, all of which was a proximate result of the wrongful acts as aforesaid.

AUG 25 0000

Attorney for the Plaintiff

The State of Alabama,	Circuit Court, Baldwin County
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Baldwin County.	TERM, 19
TO ANY SHERIFF OF THE STATI	E OF ALABAMA:
You Are Hereby Commanded to Summ	on Betty Devine and L. S. Devine
Total Are Trereby Commanded to Guinn	On The Control of the
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to appear and plead, answer or demur, v	within thirty days from the service hereof, to the complaint filed in
- 10 - 1 - 1 - 1 <del>X</del> A - 1 ( <i>x</i> /2) X	
the Circuit Court of Baldwin County, St	ate of Alabama, at Bay Minette, against
Betty Devine and L. S. De	Defendant
by	inor By Her Pather and next-friend, Berlik Pailey
원급하는 사람들의 유지하였다.	Plaintiff
Witness my hand this	day of1960
	Whice hence, clark
	Whice hence, clark

No Шоц The State of Alabama	Defendant lives at
Baldwin County CIRCUIT COURT	Received In Office
CAROLYN BAILEY, a minor by her Father and next Friend, EARL H. BAILEY	I have executed this summons
Plaintiffs vs.  BETTY DEVINE and L. S. DEVINE	this19 by leaving a copy with
Defendants Summons and Complaint	By Clark
Niled8_25	
Clerk	
Plaintiff's Attorney	Sheriff
Defendant's Attorney	Deputy Sherif

CAROLYN BAILEY, a minor,	X	
by her Father and next of friend, Earl H. Bailey,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA
vs.	Ĭ	Diamon and Company of the Company of
	X	AT LAW
BETTY DEVINE and L. S. DEVINE,	I	
Defendants.	X	

## PLEA

Come now the Defendants in the above styled cause, by their attorneys, and for answer to the complaint heretofore filed against them plead as follows:

1. Not guilty.

FILED

SEP 1 1960

AUGE 1. DUCK, CLERK REGISTER

CHASON & STONE

y: Attorneys for Dekendant

CAROLYN BAILEY, a minor, by her Father and next of friend, Earl H. Bailey,

Plaintiff,

VS.

BETTY DEVINE and L. S. DEVINE

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

\* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

PLEA

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FILED

SEP 1 18 ac

ALICE J. DUCK, CLERK REGISTER

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

#### E. G. RICKARBY

392 FAIRHOPE AVENUE FAIRHOPE, ALABAMA

August 24, 1960

Mrs. ALICE Duck Clerk of Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

RE: Carolyn Bailey vs Betty & L. S. Devine

Our File: 5139

With this I am filing Complaint in the above mentioned cause. I expect Mr. Norborne Stone to file an appearance within the next few days therefore, do not issue service.

Yours very truly,

EGR/wr Enc:

cc: Mr. Norborne Stone
Attorney at Law
Bay Minette, Alabama

8/31/60

The State of Alabama,  Baldwin County.	Circuit Court, Baldwin	County
Baldwin County.	No. 44104	
		TERM, 19
TO ANY SHERIFF OF THE STAT	TE OF ALABAMA:	
You Are Hereby Commanded to Sum	mon Betty Devine and L. S. Devi	กอ
1971 - Santa Barriero		
*		
to appear and plead, answer or demur,	within thirty days from the service hereof, to the	ne complaint filed in
the Circuit Court of Baldwin County,	State of Alabama, at Bay Minette, against	
Betty Devine and L. S. De	ਭਾ <u>ਮੇ</u> ਬe	Defendant
by Carolyn Bailey, a n	sinor By Mer Rather and next Criend, .	Harl-H. Bailey
		, Plaintiff
Witness my hand this 25	day of1960	
	alice J. Ken	
	were A here	CAC, Clerk

No	Page		Defendant lives	at
	e of Alabama			
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	vs.		thisby leaving a copy with	19
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	Defendants			-
Summons	and Complaint			
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**************************************	Plaintiff's Attorney	<i>y</i>		Sheriff
				D ( 01 10
,	Defendant's Attorne	<b>y</b>		_ DeputySherifi

Beinor

Flaintiff

BALDWIN COUNTY, ALABAMA

AT LAW

ACTUAL

DEVINE

Defendants

### OOMLLAINT

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AUG 25 CO

Attorney for the Flantiff

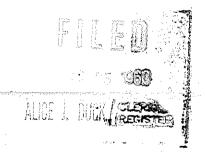
The State of Alabama,		Circuit Cou	rt, Baldwin Coun	ł <del>y</del>
Baldwin County.	No.	<u>)4</u>		
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byGarolyn Bailey,	a without Bar B	or Tolling and and		
179 a a a a a a a a a a a a a a a a a a a		<u> </u>	es-friens,-dari-d	i- Bailey
				Plaintiff
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Witness my hand this25		Weicef.	Much	, Clerk
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	Defendants					*******
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	Plaintiff's Attorney					Sherif
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D	efendant's Attorney				D	eputySherif

CAROLYM BAILEY, a minor By her Father and next o	Ť.	
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Attorney for the PlaintMf