

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

4404

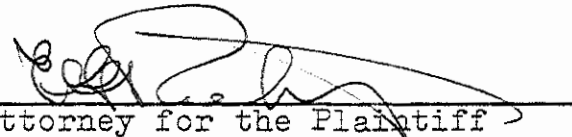
C O M P L A I N T

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 Robertsedale, 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.

FILED

AUG 25 1960

ALICE L. DICK
CLERK
REGISTER


Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 1101

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Betty Devine and L. S. Devine

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-----

Betty Devine and L. S. Devine-----, Defendant

by Carolyn Bailey, a minor By Her Father and next friend, Earl H. Bailey

-----, Plaintiff

Witness my hand this 25----- day of August----- 1960

Ellice H. Luck-----, Clerk

No. 11104 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

CAROLYN BAILEY, a minor by her
Father and next Friend, EARL H. BAILEY

Plaintiffs

vs.

BETTY DEVINE and L. S. DEVINE

Defendants

Summons and Complaint

Filed 8-25 19-60

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robert Bailey
Received In Office

8/25 19-60

_____, Sheriff

I have executed this summons

this _____ 19-____

by leaving a copy with

Recalled
by Clark

Sheriff

Deputy Sheriff

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

Plaintiff,

vs.

BETTY DEVINE and L. S.
DEVINE,

Defendants.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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

ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE

By:


Attorneys for Defendants

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

* * * * *

FILED

SEP 1 1966

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

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4404

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

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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against-----

Betty Devine and L. S. Devine-----, Defendant-----

by Carolyn Bailey, a minor By Her Father and next friend, Earl H. Bailey-----

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

Witness my hand this 25----- day of August----- 1950

Alvin J. Hensley-----, Clerk

No. _____ Page _____

The 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

Plaintiff and next of
Bailey

Plaintiff

BETTY DEVINE and
L. S. DEVINE

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

4404

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 Robertsedale, 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.

FILED

AUG 25

ALICE J. DICK
CLERK
REGISTER

Attorney for the Plaintiff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 14101

TERM, 19__

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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Betty Devine and L. S. Devine, Defendant

by Carolyn Bailey, a minor By Her Father and next friend, Earl H. Bailey

Plaintiff

Witness my hand this 25 day of August 19__60

W. J. Smith, Clerk

No. _____ Page _____

The 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____

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FILED

1959 JUL 25

ALICE J. DUCK / CLERK
REGISTER


Attorney for the Plaintiff