

CHARLES DAVID MIDDLETON,
a minor, suing by and
through his next friend
and father, Ernest L.
Middleton,

Plaintiff,

vs.

JAMES CLEVELAND BRILL,

Defendant.

X
X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

4175

The Plaintiff claims of the Defendant Three Thousand Dollars (\$3,000.00) as damages for that on heretofore, to-wit: the 5th day of September, 1959, at about 7:45 P. M. at the intersection of Racine Street and Nebraska Street in Robertsedale, Alabama, a public intersection in Baldwin County, Alabama, the Defendant so negligently operated an automobile as to cause or allow the same to run into, upon and against a bicycle being operated by the Plaintiff and as a proximate consequence and result of the negligence of the Defendant, aforesaid, the Plaintiff was caused to suffer and did suffer personal injuries in this: a simple fracture of the right leg above the ankle, a simple fracture of the right arm just below the elbow, acute shock, contusions and lacerations of the forehead, acute brain concussion and a dislocated right ankle; and he was caused to incur and did incur hospital and medical bills in and about the care and treatment of his injuries; all as a proximate consequence and result of the negligence of the Defendant, wherefore he brings this suit and asks judgment in the above amount.

CHASON & STONE

By:


Attorneys for Plaintiff

FILED
FEB 9 1960
ALICE L. DICK, CLERK
REGISTER

CHARLES DAVID MIDDLETON,
a minor, suing by and through
his next friend and father,
Ernest L. Middleton,

Plaintiff,

vs.

JAMES CLEVELAND BRILL,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

CHARLES DAVID MIDDLETON, a minor,
suing by and through his next
friend and Father, ERNEST L.
MIDDLETON,

Plaintiff,

vs.

JAMES CLEVELAND BRILL,

Defendant

IN THE CIRCUIT COURT
OF BALDWIN COUNTY,
ALABAMA

AT LAW NO. _____

P L E A

Comes now the Defendant in the above styled cause
and for answer to Plaintiff's complaint as a whole and to
each and every count thereof separately and severally, files
the following separate and several pleas:

1. Not guilty.

ARMBRECHT, JACKSON, McCONNELL & DEMOY

By *W. Hamill Waller*
Attorneys for Defendant

FILED

FEB 9 1960

ALICE L. DUCK, CLERK
REGISTER