

4850

JAMES EDISON WHITE, a minor,
suing by Edison O. S. White
as the father and next friend
of said minor,

Plaintiff,

vs.

FRED A. STROM and PAT E. STROM,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendants the sum of Five Hundred Dollars (\$500.00) as damages for that on, to-wit: March 19, 1960, at the intersection of Hand Avenue and 10th Street in Bay Minette, Baldwin County, Alabama, the Defendant Pat A. Strom, who was then and there the agent, servant or employee of the Defendant Fred A. Strom and who was then and there acting within the line and scope of her employment as such, so negligently drove an automobile belonging to the Defendant Fred A. Strom into, upon or against a motor scooter which was then and there being operated by James Edison White a minor twelve years of age and as a proximate result of the negligence of such Defendants, the said James Edison White was injured in this: he received a severe brain concussion; a laceration on his forehead; he was bruised and was caused to incur medical and hospital bills, all to the damage of the Plaintiff in the sum aforementioned, hence this suit.

FILED

MAY 20 1960

ALICE I. DICK, CLERK
REGISTER

J. C. ...
Attorney For Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. _____

JAMES EDISON WHITE, a
minor, suing by Edison O.
S. White as the father and
next friend of said minor,

Plaintiff,

vs.

FRED A. STROM and PAT E.
STROM,
Defendants.

SUMMONS AND COMPLAINT

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

JAMES EDISON WHITE, a
minor, suing by Edison
O. S. White as father
and next friend of said
minor,

Plaintiff,

vs.

FRED A. STROM and PAT
E. STROM,

Defendants.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

PLEAS

Come the Defendants in the above styled cause and for plea
to the complaint filed in said cause, say;

1. That the allegations of the complaint are untrue.
2. Not guilty.

FILED

MAY 10 1960

ALICE J. DUCK, CLERK
REGISTER


Attorneys for Defendants

JAMES EDISON WHITE, a
minor, suing by Edison
O. S. White as father and
next friend of said minor,

Plaintiff,

vs.

FRED A. STROM and PAT E.
STROM,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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PLEAS

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FILED
MAY 10 1960
AUGIE L. DUCK, CLERK
REGISTER

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Fred A Strom and Pat E. Strom

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 Fred A Strom
and Pat E. Strom-----, Defendants--

by James Edison White, a minor, suing by Edison O. S. White as
the father and next friend of said minor-----, Plaintiff--

Witness my hand this 10 day of May 1960

Peter J. Hunk, 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