

41271

DEBORAH E. JOHNSON, a minor
suing herein by Bernard C.
Johnson, as her father and
next friend,

Plaintiff,

VS.

ONREE WILSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant Four Thousand Dollars (\$4,000.00) as damages for that on, heretofore, to-wit: November 7, 1959, at approximately 3:00 P. M. the Defendant Onree Wilson, who was then and there acting by and through his agent, servant or employee, Virginia C. Wilson, who was then and there acting within the line and scope of her employment as such, so negligently operated a motor vehicle at a point seven (7) miles West of the City Limits of Bay Minette, Baldwin County, Alabama, on the Whitehouse Forks to Stapleton Road, a public road in said County, as to cause or allow the same to run into, upon and against a bicycle being then and there operated on said public road by the said Deborah E. Johnson, a minor, and as a proximate consequence and result of the negligence of the Defendant aforesaid, the said Deborah E. Johnson was seriously injured in this: she sustained a fissure fracture in the left side of her skull, she suffered a moderately severe cerebral concussion, spinal fluid was caused to leak from her left nostril and from her left ear and she was caused to lose the hearing in her left ear and to suffer severe headaches and other pain and suffering as a result of said injuries; all to her damage aforesaid, wherefore the Plaintiff brings this suit and asks judgment in the above amount.

CHASON & STONE

By:

Malcolm Stone, Jr.
Attorneys for Plaintiff

FILED

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Comes now the Defendant in the above styled cause, by his
attorney, and for answer to the complaint heretofore filed against
him, pleads as follows:

1. Not guilty.

W. H. Hays
Attorney for Defendant

