

BROOKS L. STANLEY,  
a minor, suing by Betty  
Jo Stanley, as his next  
friend,

Plaintiff,

VS.

JOSEPH B. E. BROWN,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

4634

### COMPLAINT

The plaintiff claims of the defendant the sum of TWO HUNDRED FIFTY DOLLARS (\$250.00) as damages for that heretofore on, to-wit, September 14, 1959, the plaintiff was a passenger in an automobile which was being driven in an easterly direction along United States Highway No. 90, a public highway in Baldwin County, Alabama, at a point thereon, to-wit, the Apalachee River Bridge, at which time and place the defendant so negligently operated the automobile which he was driving as to cause it to run into, upon or against the automobile in which the plaintiff was riding, and as a proximate result of the defendant's said negligence the plaintiff was injured in that he was made sick and sore, suffered pain and otherwise injured, all to the damage of the plaintiff in the sum aforesaid, hence this suit.

*J. B. Blackburn*  
Attorney for Plaintiff

FILED  
MAR 15 1961  
ALICE J. DUCK, Clerk

COMPLAINT

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suing by Betty Jo Stanley, as  
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AT LAW

NO. ~~44~~

4634

BROOKS L. STANLEY, a minor five ) IN THE CIRCUIT COURT OF  
years of age, suing by and through )  
his mother and next friend, ) BALDWIN COUNTY, ALABAMA  
BETTY JO STANLEY, )

Plaintiff

) AT LAW

Vs.

) CASE NO. \_\_\_\_\_

JOSEPH B. E. BROWN,

)

Defendant

)

)

A N S W E R

Comes now the defendant in the above styled cause, and  
for answer to the complaint heretofore filed, and each count  
thereof, separately and severally, files the following  
separate and several pleas:

ONE

Not guilty.

W. C. Boone Jr.  
Attorney for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

7 filed  
3-16-61  
Reice-frank  
Clerk