

JOANNA STANLEY, a minor one)	IN THE CIRCUIT COURT OF
and one-half years of age,)	
suing by and through her)	BALDWIN COUNTY, ALABAMA
mother and next friend,)	
BETTY JO STANLEY,)	AT LAW
)	
Plaintiff)	CASE NO. <u>4635</u>
)	
Vs.)	
)	
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. E. Boone Jr.
Attorney for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Filed
3-16-61
Alice J. Hanks
Clerk

JOANNA STANLEY, a minor,
suing by Betty Jo Stanley,
as her next friend,

Plaintiff,
VS.

JOSEPH B. E. BROWN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

4635

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 she 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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by Betty Jo Stanley, as her next
friend,

Plaintiff,

VS.

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