

STATE OF ALABAMA

*

TO ANY SHERIFF OF

BALDWIN COUNTY

*

THE STATE OF ALABAMA

You are hereby commanded to summon Jeramiah Franklin and Louis Marez to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Joseph Pleasant, Jr., a minor suing by his father and next friend, Joseph Pleasant, Sr.

Witness my hand this 12 day of July 1961.

Not Found

Alice J. Duck
Alice J. Duck, Clerk

JOSEPH PLEASANT, JR., A
MINOR, suing by his father
and next friend, Joseph
Pleasant, Sr.

Plaintiff

vs

Jeramiah Franklin and
Louis Marez

Defendants

*

IN THE CIRCUIT COURT OF

*

BALDWIN COUNTY, ALABAMA

*

AT LAW

*

CASE NO. 4767

*

The Plaintiff, Joseph Pleasant, Jr., a minor suing by his father and next friend, Joseph Pleasant, Sr., claims of the Defendants the sum of \$10,000.00 as damages for that on to-wit, 3rd day of July, 1961, the Plaintiff was lawfully riding on the back of a truck upon a public highway in Baldwin County, Alabama at a point on U. S. Highway 31 about two miles South of Bay Minette, and that then and there the Defendant, Jeramiah Franklin, who was operating said truck, a servant agent or employee of the Defendant, Louis Marez, while acting within the line and scope of his employment as such, so negligently operated the truck he was driving as to throw the Plaintiff off of it and as a direct approximate result of said negligence, the Plaintiff was injured as follows:

He sustained a concussion of the brain and was rendered unconscious and his back and the muscles, tendons, ligaments and nerves thereof were bruised, wrenched, sprained and torn and he was permanently injured; and that his whole physical being was shaken and shocked and he was made sick and sore and was caused to suffer great physical pain and mental anguish. His nervous system was greatly shocked and impaired. That the Plaintiff was caused to incur great expenses in and about procuring Doctors, Medicine, Medical Aid and Attention, hospital care and treatment of the said injuries and that he will be required to do so indefinitely.

WILTERS & BRANTLEY

By: Robert M Brantley

The Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

By: Robert M Brantley

FILED
JUL 12 1961
ALICE J. DUCK, Clerk

4767

Joseph Pleasant, Jr., a minor,
suing by his father and next
friend, Joseph Pleasant, Sr.
PLAINTIFF

vs

Jeramiah Franklin and
Louis Marez
Defendants

Received 16 day of July 1961
I served a copy of the within 16 day of July 1961
on Jeramiah Franklin
Louis Marez
By service on Taylor Wilkins, Sheriff
By Taylor Wilkins, Sheriff
D. S.

Not found

Returned 16 day of Aug 1961
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By Edleigh Steatham
Deputy Sheriff

FILED
JUL 12 1961

ALICE J. DICK, CLERK

STATE OF ALABAMA

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TO ANY SHERIFF OF

BALDWIN COUNTY

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THE STATE OF ALABAMA

You are hereby commanded to summon Jeramiah Franklin and Louis Marez to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Joseph Pleasant, Jr., a minor suing by his father and next friend, Joseph Pleasant, Sr.

Witness my hand this 12 day of July 19 61.

Alice J. Duck
Alice J. Duck, Clerk

JOSEPH PLEASANT, JR., A
MINOR, suing by his father
and next friend, Joseph
Pleasant, Sr.

Plaintiff

VS

Jeramiah Franklin and
Louis Marez

Defendants

*

IN THE CIRCUIT COURT OF

*

BALDWIN COUNTY, ALABAMA

*

AT LAW

*

CASE NO. _____

*

The Plaintiff, Joseph Pleasant, Jr., a minor suing by his father and next friend, Joseph Pleasant, Sr., claims of the Defendants the sum of \$10,000.00 as damages for that on to-wit, 3rd day of July, 1961, the Plaintiff was lawfully riding on the back of a truck upon a public highway in Baldwin County, Alabama at a point on U. S. Highway 31 about two miles South of Bay Minette, and that then and there the Defendant, Jeramiah Franklin, who was operating said truck, a servant agent or employee of the Defendant, Louis Marez, while acting within the line and scope of his employment as such, so negligently operated the truck he was driving as to throw the Plaintiff off of it and as a direct approximate result of said negligence, the Plaintiff was injured as follows:

4762

He sustained a concussion of the brain and was rendered unconscious and his back and the muscles, tendons, ligaments and nerves thereof were bruised, wrenched, sprained and torn and he was permanently injured; and that his whole physical being was shaken and shocked and he was made sick and sore and was caused to suffer great physical pain and mental anguish. His nervous system was greatly shocked and impaired. That the Plaintiff was caused to incur great expenses in and about procuring Doctors, Medicine, Medical Aid and Attention, hospital care and treatment of the said injuries and that he will be required to do so indefinitely.

WILTERS & BRANTLEY

By:

William M Brantley

The Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

By:

William M Brantley

4767

He sustained a concussion of the brain and was rendered unconscious and his back and the muscles, tendons, ligaments and nerves thereof were bruised, lacerated, sprained and torn and he was permanently injured; and since his whole physical being was shaken and shocked and he was made sick and

Joseph Pleasant, Jr., a minor
suing by his father and next
friend, Joseph Pleasant, Sr.,
Plaintiff

vs

Jeremiah Franklin and
Louis Marez
Defendants

FILED

JUL 12 1961

ALICE J. DUCK, Clerk

WITNESSES & VERIFICATION

PA: 70667-11-12-61

WITNESSES & VERIFICATION

PA: 70667-11-12-61

STATE OF ALABAMA

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TO ANY SHERIFF OF

BALDWIN COUNTY

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THE STATE OF ALABAMA

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Witness my hand this 12 day of July 1961.

Alice J. Duck
Alice J. Duck, Clerk

JOSEPH PLEASANT, JR., A
MINOR, suing by his father
and next friend, Joseph
Pleasant, Sr.

Plaintiff

vs

Jeramiah Franklin and
Louis Marez

Defendants

*

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

*

*

AT LAW

*

CASE NO. _____

*

The Plaintiff, Joseph Pleasant, Jr., a minor suing by his father and next friend, Joseph Pleasant, Sr., claims of the Defendants the sum of \$10,000.00 as damages for that on to-wit, 3rd day of July, 1961, the Plaintiff was lawfully riding on the back of a truck upon a public highway in Baldwin County, Alabama at a point on U. S. Highway 31 about two miles South of Bay Minette, and that then and there the Defendant, Jeramiah Franklin, who was operating said truck, a servant agent or employee of the Defendant, Louis Marez, while acting within the line and scope of his employment as such, so negligently operated the truck he was driving as to throw the Plaintiff off of it and as a direct approximate result of said negligence, the Plaintiff was injured as follows:

7507
He sustained a concussion of the brain and was rendered unconscious and his back and the muscles, tendons, ligaments and nerves thereof were bruised, wrenched, sprained and torn and he was permanently injured; and that his whole physical being was shaken and shocked and he was made sick and sore and was caused to suffer great physical pain and mental anguish. His nervous system was greatly shocked and impaired. That the Plaintiff was caused to incur great expenses in and about procuring Doctors, Medicine, Medical Aid and Attention, hospital care and treatment of the said injuries and that he will be required to do so indefinitely.

WILGERS & BRANTLEY

By: Edmund M Brantley

The Plaintiff demands a trial by jury.

WILGERS & BRANTLEY

By: Edmund M Brantley

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4767

Joseph Pleasant, Jr., a minor
suing by his father and next
friend, Joseph Pleasant, Sr.,
Plaintiff

vs

Jeramiah Franklin and
Louis Marez
Defendants

FILED
JUL 12 1961

ALICE J. DUCK, Clerk

ALICE J. DUCK, Clerk

Joseph Pleasant, Jr.

ALICE J. DUCK, Clerk

Jeramiah Franklin and Louis Marez