

IDA LOUISE KENNAMER, a minor, X
suing by and through Ralph X
Kennamer, her father and next X
friend, X

Plaintiff, X

Vs. X

PAUL MUELLER, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5141

Comes now the Defendant in the above styled cause and
files the following plea to Count #1 and Count #2 thereof
separately and severally:

1.

The general issue.

2.

The Defendant is not guilty of the matters alleged
therein.

WILTERS, BRANTLEY AND NESBIT

BY:

Robert M Brantley

FILED

MAY 28 1962

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

MAY

TERM, 1962

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon PAUL MUELLER

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 _____

PAUL MUELLER

_____, Defendant_____

by IDA LOUISE KENNAMER, a minor, suing by and through Ralph Kennamer,
her father and next friend,

_____, Plaintiff_____

Witness my hand this 15 day of May 1962

Alice F. Duck

_____, Clerk

Defendant resides at Pirates Cove, Baldwin County, Alabama.

EX-5-22-62

IDA LOUISE KENNAMER, a minor,
suing by and through Ralph
Kennamer, her father and next
friend,

Plaintiff,

vs.

PAUL MUELLER,

Defendant.

)
)
) IN THE CIRCUIT COURT OF

)
) BALDWIN COUNTY, ALABAMA

)
) AT LAW - NO. _____

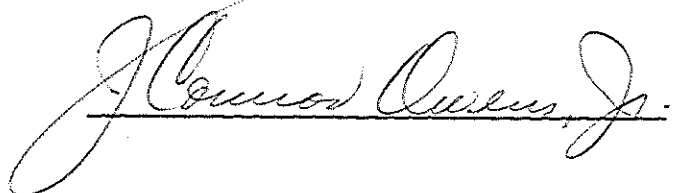
COUNT ONE

The Plaintiff, Ida Louise Kennamer, is a minor child over sixteen (16) years of age and files this suit by and through Ralph Kennamer, as her father and next friend.

Plaintiff claims of the Defendant Five Thousand and No/100 (\$5,000.00) Dollars damages for an assault and battery committed by the Defendant on the Plaintiff, viz: on the 29th day of April, 1962.

COUNT TWO

Plaintiff claims of the Defendant the sum of Five Thousand and no/100 (\$5,000.00) Dollars damages for that on, to-wit, the 29th day of April, 1962, the Defendant, at a point on Pedido Bay known as Pirates Cove, in Baldwin County, Alabama, did commit an assault and battery on and upon the Plaintiff by striking, shoving or pushing the Plaintiff from a wharf and as a direct and proximate consequence of this assault and battery the Plaintiff was caused to suffer great bodily injury, she was torn and battered in body, her right foot was severely cut, she was caused to be hospitalized, she was made sick, sore and lame, she was caused to suffer great physical pain and mental anguish, she was thrown into a nervous shock, she was caused to be confined for eleven days and thereby lost eight days from school; she was required to have medical treatment for the injury received on account of this assault and battery, all to her damage in the amount claimed.


J. Thomas Owens, Jr.

Plaintiff respectfully demands a trial by jury.

James C. Curran, Jr.

Defendant may be served:

Paul Mueller
Pirates Cove
Pedido Bay, about
10 miles southeast
of Elberta, Alabama.

Received 15 day of May 1962
and on 22 day of May 1962
I served a copy of the within S & C
on Paul Mueller
By service on _____

TAYLOR WILKINS, Sheriff
By W. L. Wilkins D. S.

W. L. Wilkins

Sheriff claims 7.2 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY W. L. Wilkins
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW NO. 5141.

IDA LOUISE KENNAMER, a
minor, suing by and through
Ralph Kennamer, her father
and next friend,

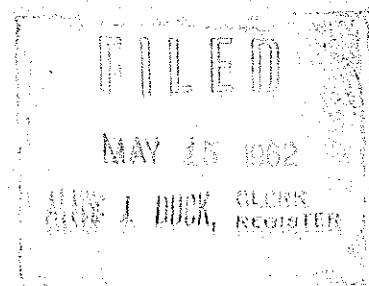
Plaintiff,

vs.

PAUL MUELLER,

Defendant.

SUMMONS & COMPLAINT



J. CONNOR OWENS, JR.
ATTORNEY AT LAW
Dahlberg Building
BAY MINETTE, ALABAMA