

WILEY E. DAVIS, as the
Father and next Friend
of EDITH E. DAVIS, a Minor,
Plaintiff,

VS.

CHARLES E. BUCHANAN and
LOUIS C. JACKSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

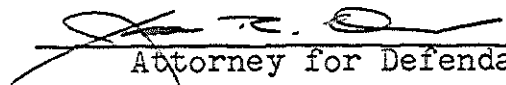
5181

PLEA

Now come the Defendants in the above styled cause and
for plea to the complaint heretofore filed in said cause say
separately and severally:

1. Not guilty.

FILED
JUN 25 1962
ALICE J. DUCK, CLERK
REGISTER #


Attorney for Defendants

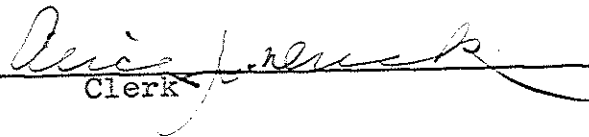
STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Charles E. Buchanan and Louis C. Jackson 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 same, then and there to answer the complaint of Wiley E. Davis, as the Father and next friend of Edith E. Davis, a minor.

Witness my hand this the 21 day of June, 1962.


Clerk

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of EDITH E. DAVIS, a
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CHARLES E. BUCHANAN and
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Defendants.

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AT LAW

COUNT ONE

The Plaintiff claims of the Defendants the sum of \$500.00 as damages for that on, to-wit: February 3, 1962, at the intersection of Section Street and Moffet Street in Fairhope, Alabama, in Baldwin County, Alabama, the Defendant Charles E. Buchanan, who was then and there the agent, servant or employee of the Defendant Louis C. Jackson, and who was acting within the line and scope of his employment as such, negligently drove an automobile into or against an automobile in which the said Edith E. Davis was riding and as a proximate result of the negligence of such Defendants the said Edith E. Davis was injured in this: she received a severe blow on her head which caused her to be unconscious for several hours, she received bruises and lacerations and she was confined to the hospital for about three days. The Plaintiff avers that the negligence of such Defendants was the proximate cause of the Plaintiff's injuries, hence this suit.

FILED
JUN 21 1962
ALICE J. DUCK, CLERK
REGISTER

Barbara Stone
Attorneys for Plaintiff

WILEY E. DAVIS, as the Father
and next Friend of Edith E.
Davis, a minor,

Plaintiff,

vs.

CHARLES E. BUCHANAN and LOUIS
C. JACKSON,

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Summons and Complaint
