

OSCAR B. LORD

Plaintiff,

vs.

HOMER BOYD STREHLE,

Defendant,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

CASE NO. 9007

COUNT ONE

*The Plaintiff, as father of the minor child, Terry L. Lord, claims of the Defendant the sum of Three Thousand Dollars (\$3,000) for that heretofore, on to wit December 11, 1968, the Defendant, so negligently operated a motor vehicle which he was driving on Elberta Dump Road, a public road in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, as to negligently cause the said vehicle which he was driving, to run into, over, and against a motor bike on which the minor son of the Plaintiff, namely Terry L. Lord, was at that time and place riding. Plaintiff avers that as a proximate and immediate consequence of the negligence of the Defendant as aforesaid, his minor son was seriously injured, suffered a broken leg, bruises, cuts and internal injuries and much pain and mental anguish, and that he had to undergo extensive and lengthy hospital and medical treatment for said injuries and was disabled for approximately seven (7) months, as a result of which the Plaintiff has incurred hospital, medical and other expenses, was deprived of his son's services during this disability; hence this suit.*

COUNT TWO

*Plaintiff, as father of the minor child, Terry L. Lord, claims of the Defendant the sum of Three Thousand Dollars (\$3,000) damages, for that heretofore on to wit December 7, 1968, the Defendant did while operating a motor vehicle on the Elberta Dump Road, a public road located in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, did so recklessly and wantonly operate the said vehicle as to recklessly and wantonly cause the vehicle to run into, over, or against a motor bike which the*

said Terry L. Lord, minor son of the Plaintiff, was then and there riding. Complainant avers that as the proximate and direct consequence of the wantonness and recklessness of the Defendant as aforesaid, his said minor son suffered serious injuries, including a broken leg, internal injuries, bruises and cuts, mental pain and anguish, as a result of all of which he had to undergo extensive hospital and medical treatment for the said injuries, and was disabled for approximately seven (7) months, in result of which the Plaintiff has incurred hospital, medical and other expenses, and suffered the loss of his said son's services during his disability; hence this suit.

  
Attorney for the Plaintiff

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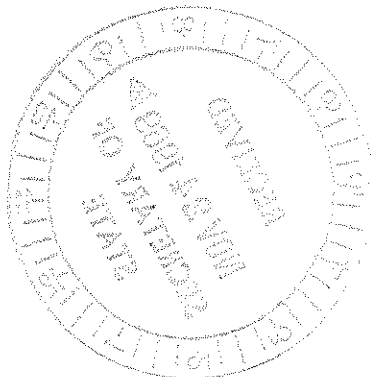
MOORE, MOORE, DOWNING AND LAYDEN  
BY: James E. Moore, 920 Daughn Street  
Mobile, Alabama

Defendant is a non-resident, residing at:  
Star Rt. Box 480  
Pensacola, Florida

DEMAND FOR JURY

Plaintiff demands trial by Jury.

  
Attorney for the Plaintiff



FILED

NOV 21-69

ALICE J. F.

said Terry L. Lord, minor son of the Plaintiff, was then and there riding.

Complaint avers that as the proximate and direct consequence of the wrong-

ness and recklessness of the Defendant as aforesaid, his said minor son suffered

serious injuries, including a broken leg, internal injuries, bruises and cuts, mental

pain and anguish, as a result of all of which he had to undergo extensive hospital

and medical treatment for the said injuries, and was disabled for approximately seven

(7) months, in result of which the Plaintiff has incurred hospital, medical and other

expenses, and suffered the loss of his said son's services during his disability;

hence this suit.

19

*[Handwritten signature]*  
Attorney for the Plaintiff

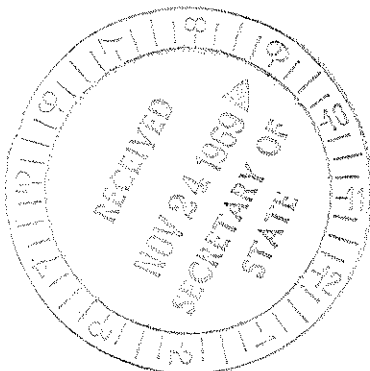
MOORE, MOORE, DOWNING AND LEE, P.C.  
BY: James E. Moore, Alabama

Defendant is a non-resident, residing at:  
Star Rt. Box 480  
Pensacola, Florida

DEMAND FOR JURY

Plaintiff demands trial by jury.

*[Handwritten signature]*  
Attorney for the Plaintiff



FILED

NOV 21 - 69

MAE J. ...



MABEL AMOS  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY, ALABAMA 36104

January 12, 1970

Honorable Cecil G. Chason  
Attorney at Law  
Foley, Alabama 36535

Re: Larry Younce and Harvey E. Younce, Plaintiffs  
VS Homer Boyd Strehle, Defendant, Circuit Court  
of Baldwin County, Cases Numbered 9024 and 9025

Dear Mr. Chason:

Enclosed herewith please find a copy of the letter  
I received from Criterion Insurance Company reference the  
above styled causes. This copy is for your information and  
file.

If I can be of further assistance, please feel free  
to call on me.

With best wishes, I am

Very truly yours,

Mabel S. Amos  
Secretary of State

fc  
Enclosure

CC: Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama 36507

LEO GOODWIN  
Founder Chairman

LORIMER A. DAVIDSON  
Chairman of the Board

DAVID LLOYD KREEGER  
Vice Chairman of the Board

ALVIN E. KRAUS  
President



An Affiliate of  
GOVERNMENT EMPLOYEES  
INSURANCE COMPANY

*Criterion*

INSURANCE COMPANY

GOVERNMENT EMPLOYEES INSURANCE OPERATIONS BUILDING  
WASHINGTON, D. C. 20015

State of Alabama  
Office of Secretary of State  
Montgomery, AL 3610

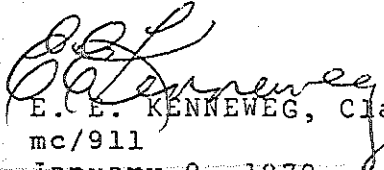
CLAIM: T-10-50305  
INSURED: Homer B. Strehle  
DATE OF ACCIDENT: 12/7/68  
SUIT: Harvey E. Younce vs. Homer Boyd Strehle  
CASE NO.: 9024 and Larry Younce, plaintiff, sues  
his next friend, Harvey E. Younce vs.  
Homer Boyd Strehle  
CASE NO.: 9025

Gentlemen:

We wish to acknowledge receipt of the above captioned lawsuits that have been referred to our attorneys Lyons, Pipes and Cook whose office is located at 2510 First National Bank Building, Mobile, Alabama.

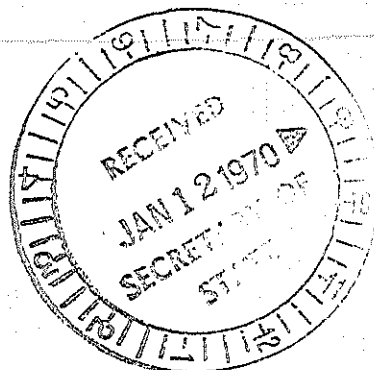
Thank you for your cooperation.

Very truly yours,

  
E. E. KENNEWEG, Claims Examiner

mc/911

January 9, 1970



cc: Lyons, Pipes, & Cook, Attys.  
2510 First National Bank Bldg.  
Mobile, ALA

1

air 9009

1

OSCAR B. LORD,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA,
	)	
vs.	)	AT LAW.
	)	
HOMER BOYD STREHLE,	)	
	)	
Defendant.	)	CASE NO. 9007

ANSWER

Comes the Defendant, by his attorney, and for answer to the Complaint filed in this cause and to each and every Count thereof, files the following answers:

ONE

Not Guilty.

~~TWO~~

~~Not Guilty.~~

*Frankie Mason*  
 Attorney for the Defendant

**FILED**  
 DEC 12 1969

**ALICE J. DUCK** CLERK  
 REGISTER

OSCAR B. LORD,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY, ALABAMA,
	)	
vs.	)	AT LAW.
	)	
HOMER BOYD STREHLE,	)	
	)	
Defendant.	)	CASE NO. <u>9207</u>

COUNT ONE

*The Plaintiff, as father of the minor child, Terry L. Lord, claims of the Defendant the sum of Three Thousand Dollars (\$3,000) for that heretofore, on to wit December 11, 1968, the Defendant, so negligently operated a motor vehicle which he was driving on Elberta Dump Road, a public road in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, as to negligently cause the said vehicle which he was driving, to run into, over, and against a motor bike on which the minor son of the Plaintiff, namely Terry L. Lord, was at that time and place riding. Plaintiff avers that as a proximate and immediate consequence of the negligence of the Defendant as aforesaid, his minor son was seriously injured, suffered a broken leg, bruises, cuts and internal injuries and much pain and mental anguish, and that he had to undergo extensive and lengthy hospital and medical treatment for said injuries and was disabled for approximately seven (7) months, as a result of which the Plaintiff has incurred hospital, medical and other expenses, was deprived of his son's services during his disability; hence this suit.*

COUNT TWO

*Plaintiff, as father of the minor child, Terry L. Lord, claims of the Defendant the sum of Three Thousand Dollars (\$3,000) damages, for that heretofore on to wit December 7, 1968, the Defendant did while operating a motor vehicle on the Elberta Dump Road, a public road located in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, did so recklessly and wantonly operate the said vehicle as to recklessly and wantonly cause the vehicle to run into, over, or against a motor bike which the*



said Terry L. Lord, minor son of the Plaintiff, was then and there riding. Complainant avers that as the proximate and direct consequence of the wantonness and recklessness of the Defendant as aforesaid, his said minor son suffered serious injuries, including a broken leg, internal injuries, bruises and cuts, mental pain and anguish, as a result of all of which he had to undergo extensive hospital and medical treatment for the said injuries, and was disabled for approximately seven (7) months, in result of which the Plaintiff has incurred hospital, medical and other expenses, and suffered the loss of his said son's services during his disability; hence this suit.

  
Attorney for the Plaintiff

MOORE, MOORE, DOWNING AND LAYDEN  
BY: James E. Moore, 920 Dauphin Street  
Mobile, Alabama

Defendant is a non-resident, residing at:  
Star Rt. Box 480  
Pensacola, Florida

DEMAND FOR JURY

Plaintiff demands trial by Jury.

  
Attorney for the Plaintiff

FILED

NOV 21 1969

ALICE J. BUCK CLERK REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 9007

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon HOMER BOYD STREHLE

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

HOMER BOYD STREHLE Defendant

by OSCAR B. LORD

Plaintiff

Witness my hand this 21st day of November 1969

*Alise J. Hutch*, Clerk

Ed/  
11-24-69

860

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Defendant lives at

OSCAR B. LORD

Plaintiffs

vs.

HOMER BOYD STREHLE

Defendants

SUMMONS AND COMPLAINT

Filed November 21, 1969

Malice V. Duck Sheriff of Montgomery County, Alabama, Clerk

Claim \$1.50 each for

servicing 1 process(es) and \$1.00

travel expense on each of 1

process(es) or a total of \$2.50

W. L. Mason Deputy Sheriff

Moore, Moore, Downing & Layden

by: James E. Moore Plaintiff's Attorney

Defendant's Attorney

RECEIVED IN OFFICE

M. S. BUTLER, Sheriff Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

Executed by serving 7 copies of the within on Mable Ann Secretary of State of The State of Alabama.

This the 24 day of Nov 1969 Sheriff of Montgomery County

M. S. Butler,

By W. L. Mason D. S.

Sheriff

Deputy Sheriff



MABEL AMOS  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY, ALABAMA 36104

January 12, 1970

Honorable James E. Moore  
108 Llewelyn Court  
Mobile, Alabama 36608

Re: Terry L. Lord, a minor, and Oscar B. Lord,  
Plaintiffs VS Homer Boyd Strehle, Circuit  
Court of Baldwin County, Cases Numbered  
9006 and 9007

Dear Mr. Moore:

Reference the above styled causes, I am enclosing  
herewith a letter from Criterion Insurance Company which  
I think you should have for your file and information.

If I can be of further assistance, please feel  
free to call on me.

With best wishes, I am

Very truly yours,

Mabel S. Amos  
Secretary of State

fc  
Enclosure

CC: Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama 36507

LEO GOODWIN  
Founder Chairman

LORIMER A. DAVIDSON  
Chairman of the Board

DAVID LLOYD KREEGER  
Vice Chairman of the Board

ALVIN E. KRAUS  
President



An Affiliate of  
GOVERNMENT EMPLOYEES  
INSURANCE COMPANY

# Criterion

INSURANCE COMPANY

GOVERNMENT EMPLOYEES INSURANCE OPERATIONS BUILDING  
WASHINGTON, D. C. 20015

State of Alabama  
Office of the Secretary of State  
Montgomery, AL 36104

CLAIM: T-10-50305

INSURED: Homer B. Strehle

DATE OF ACCIDENT: 12/7/68

SUITS: Oscar B. Lord vs. Homer Boyd Strehle

CASE NO. 9007

and Harry L. Lord, a minor, suing by his next  
friend and father, Oscar B. Lord vs. Homer Boyd  
Strehle


CASE NO. 9006

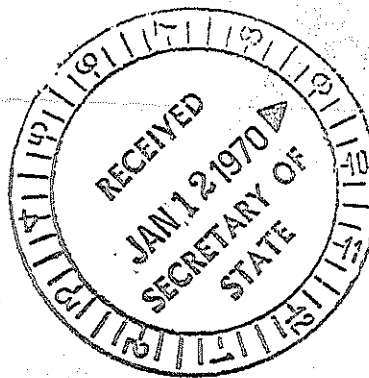
Gentlemen:

We wish to advise that this case settled prior to our  
having to refer the matter to our attorneys.

Thank you for forwarding to us.

Very truly yours,

  
E. E. KENNEWEG, Claims Examiner  
mc/911  
January 9, 1970



cc: Lyons, Pipes & Cook, Attys.  
2510 First National Bank Bldg.  
Mobile, ALA

OSCAR B. LORD VS HOMER BOYD STREHLE (9007)

**INSTRUCTIONS TO DELIVERING EMPLOYEE**

Show to whom, date, and address where delivered  
 Deliver ONLY to addressee  
*(Additional charges required for these services)*

**RECEIPT**

*Received the numbered article described below.*

REGISTERED NO.	SIGNATURE OR NAME OF ADDRESSEE <i>(Must always be filled in)</i>
CERTIFIED NO. <b>54447</b>	1 <i>Homer Boyd Strehle</i>
INSURED NO.	2 SIGNATURE OF ADDRESSEE'S AGENT, IF ANY <b>Deliver to addressee only</b>
DATE DELIVERED <i>12-1-69</i>	3 SHOW WHERE DELIVERED <i>(only if requested)</i>

655-16-71548-10 GPO

TERRY L. LORD BY FATHER VS HOMER BOYD STREHLE (9006)

**INSTRUCTIONS TO DELIVERING EMPLOYEE**

Show to whom, date, and address where delivered  
 Deliver ONLY to addressee  
*(Additional charges required for these services)*

**RECEIPT**

*Received the numbered article described below.*

REGISTERED NO.	SIGNATURE OR NAME OF ADDRESSEE <i>(Must always be filled in)</i>
CERTIFIED NO. <b>54448</b>	1 <i>Homer Boyd Strehle</i>
INSURED NO.	2 SIGNATURE OF ADDRESSEE'S AGENT, IF ANY <b>Deliver to addressee only</b>
DATE DELIVERED <i>12-1-69</i>	3 SHOW WHERE DELIVERED <i>(only if requested)</i>

655-16-71548-10 GPO

POST OFFICE DEPARTMENT  
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID  
PAYMENT OF POSTAGE, \$300

1969

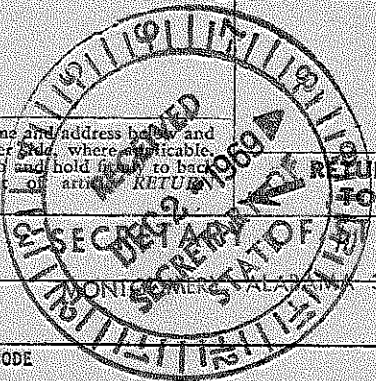
POSTMARK OF  
DELIVERING OFFICE

INSTRUCTIONS: Show name and address below and complete instructions on other side, where applicable. Moisten gummed ends, attach and hold firmly to back of article. Print on front of article. RETURN RECEIPT REQUESTED.

NAME OF SENDER

STREET AND NO. OR P.O. BOX

POST OFFICE, STATE, AND ZIP CODE



POST OFFICE DEPARTMENT  
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID  
PAYMENT OF POSTAGE, \$300

1969

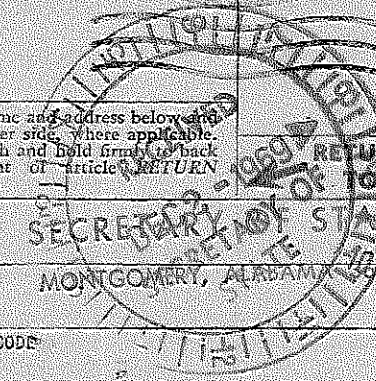
POSTMARK OF  
DELIVERING OFFICE

INSTRUCTIONS: Show name and address below and complete instructions on other side, where applicable. Moisten gummed ends, attach and hold firmly to back of article. Print on front of article. RETURN RECEIPT REQUESTED.

NAME OF SENDER

STREET AND NO. OR P.O. BOX

POST OFFICE, STATE, AND ZIP CODE



FD Form 3811 Apr. 1967

FD Form 3811 Apr. 1967