

MOORE, MOORE, DOWNING & LAYDEN

LAWYERS

920 DAUPHIN STREET

P. O. BOX 4457

MOBILE, ALABAMA 36604

GEORGE J. MOORE
JAMES E. MOORE
MAURICE A. DOWNING
LIONEL L. LAYDEN

CABLE ADDRESS: LAWYER
TEL. NO.: 432-5641

April 10, 1972

Mrs. Eunice B. Blackmon
Clerk of the Circuit Court
Baldwin County, Alabama
Bay Minette, Alabama

*Set for
4-13-72*

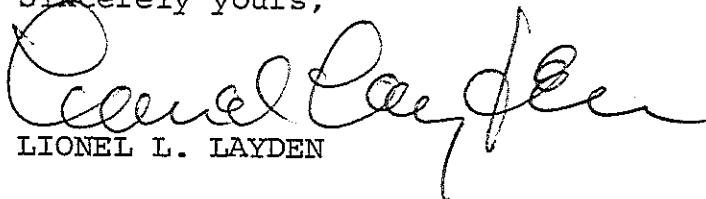
Dear Mrs. Blackmon:

In the case of Eugene Gilmore vs. James McGill, case no. 9817, please enter a judgment by consent for \$100.00 and enclosed you will find a draft for \$100.00 in payment of that judgment. Please mail the costs bill in that case to Mr. Broox G. Holmes, Esquire, in care of Messrs. Armbrecht, Jackson and Demouy, Attorneys at Law, Post Office Box 290, Mobile, Alabama 36601.

Also, I would appreciate it very much if you would dismiss the case of Lewis B. Gilmore vs. James McGill, case no. 9816 and Janie O. Gilmore vs. James McGill, case no. 9815. Please also mail the costs bills for same to Mr. Holmes at the above stated address.

Thanking you, I remain

Sincerely yours,


LIONEL L. LAYDEN

LLL/jh

Enc: (draft no. 467287)

cc: Broox G. Holmes, Esquire
Attorney at Law
Post Office Box 290
Mobile, Alabama 36601

THE
UNITED STATES OF AMERICA
DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

MEMORANDUM

TO : DIRECTOR

DATE: 10/15/54

RE: [Illegible]

[Illegible]

9810

[Illegible]

[Illegible]

[Illegible]

MOORE, MOORE, DOWNING & LAYDEN

LAWYERS

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MOBILE, ALABAMA 36604

GEORGE J. MOORE
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CABLE ADDRESS: LAWYER
TEL. No.: 432-5641

April 21, 1972

Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: EUGENE GILMORE
Case no: 9817

Dear Mrs. Blackmon:

Please find enclosed herewith the original and one copy of an Affidavit in the above captioned case requesting that you withdraw the funds on the above minor in the amount of \$100.00, which has been executed by both parents.

I would appreciate your mailing the check directly to Mr. and Mrs. Lewis Gilmore, Post Office Box 629, Century, Florida, with a copy of your cover letter to us.

Sincerely yours,



LIONEL L. LAYDEN *llh*

LLL/jh

Encs:2

P. S. In the event that the funds are in the Probate Court, please forward the Affidavit to them, together with this letter.

L.L.L. 

ARMBRECHT, JACKSON & DEMOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

TELEPHONE
AREA CODE 205
432-6751

CABLE ADDRESS
SEALAW

WM. H. ARMBRECHT
THEODORE K. JACKSON
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOX G. HOLMES
W. BOYD REEVES
FRANK B. MCRIGHT
CLIFFORD FOSTER, III
T. K. JACKSON, III
E. B. PEEBLES, III
F. M. KEELING
GEOFFREY V. PARKER
THOMAS M. AMMONS, III
WILLIAM B. HARVEY
KIRK C. SHAW
NORMAN E. WALDROP, JR.

April 20, 1972

Mrs. Eunice B. Blackmon
Clerk, Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama 36507

Re: Eugene Gilmore, a minor vs.
James McGill
Case No. 9817
Circuit Court of Baldwin County

Dear Mrs. Blackmon:

Please find enclosed herewith our firm check in the amount of \$31.00 in payment of the Court costs in the above case. The judgment has already been paid by Consolidated Underwriters check #467287 which was mailed to you by the plaintiff's attorney on April 10, 1972.

I am also enclosing a certificate for your signature to the effect that the judgment has been paid and satisfied and the Court costs paid. Please execute same and return to me in the self-addressed envelope. Thank you.

Very truly yours,


Broox G. Holmes

BGH:sh
Enclosures

EUGENE GILMORE, a minor	:	IN THE CIRCUIT COURT OF
suing by and through his father,	:	BALDWIN COUNTY,
LEWIS B. GILMORE,	:	ALABAMA
Plaintiff,	:	AT LAW
VS.	:	
JAMES McGILL,	:	
Defendant.	:	CASE NO. 9817

P L E A

Comes now the Defendant, JAMES McGILL, in the above styled cause, and for answer to the Complaint and to each and every count thereof, says:

1. Not guilty.

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Defendant.

By: *Brook G. Holmes*
BROOK G. HOLMES

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 3rd day of Aug, 1971, served a copy of the foregoing pleading on counsel for all parties to this proceeding, by mailing the same by United States mail, properly addressed, and first class postage prepaid.

Brook G. Holmes

FILED

AUG 4 1971

EUNICE B. BLACKMON CIRCUIT CLERK

EUGENE GILMORE, a minor)	IN THE CIRCUIT COURT OF
suing by and through his)	BALDWIN COUNTY, ALABAMA
father, LEWIS B. GILMORE,)	
)	AT LAW
Plaintiff,)	
vs.)	
JAMES MCGILL,)	CASE NO. <u>9817</u>
)	
Defendant.)	

Comes now the Plaintiff, by and through his father, Lewis B. Gilmore, and claims of the Defendant the sum of TEN THOUSAND AND NO/100 (\$10,000.00) DOLLARS damages for that heretofore on, to-wit: January 17, 1971, the Defendant so negligently operated the motor vehicle he was then and there driving on Alabama Highway 16 between Country Road 55 and Hinote Road, said highway and roads being public roads in the County of Baldwin, State of Alabama, so as to cause or allow the said motor vehicle to run into, over, upon or against the motor vehicle in which the Plaintiff was a passenger, which automobile was also on said Alabama Highway 16 between Country Road 55 and Hinote Road at said place, and Plaintiff alleges that as a direct and proximate result of the said negligence of the Defendant, the Plaintiff was injured as follows:

Plaintiff was badly bruised, strained and sprained; Plaintiff suffered injuries to his right leg; Plaintiff was permanently injured; Plaintiff was caused to suffer pain; Plaintiff was caused to expend sums of money on doctor and medical expenses, all to his damage, hence this suit.

MOORE, MOORE, DOWNING & LAYDEN

By Lionel L. Layden
 Lionel L. Layden
 Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury.

FILED

APR 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK
 Please serve Defendant
 at: Route 1, Summerdale, Alabama

MOORE, MOORE, DOWNING & LAYDEN

By Lionel L. Layden
 Lionel L. Layden
 Attorney for Plaintiff
 920 Dauphin Street
 Mobile, Alabama 36604

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

} No. 9817.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES MCGILL.....

.....
.....
.....

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.....

..... JAMES MCGILL Defendant.....

by EUGENE GILMORE, a minor suing by and through his father, LEWIS B. GILMORE,.....

..... Plaintiff.....

Witness my hand this 30th day of April 19 71.

Eunice B. Blackburn Clerk

S. Dale

AUG 27 1971

No. 9817..... Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

EUGENE GILMORE, a minor suing by and through his father LEWIS B. GILMORE

Plaintiffs.

vs.

JAMES MCGILL

Defendants

SUMMONS AND COMPLAINT

Filed April 30, 1971

Funice B. Blackmon Clerk

Moore, Moore, Downing & Layden
Plaintiff's Attorney

Defendant's Attorney

TAYLOR WILKINS
SHERIFF
Defendant lives at
c/o Robert K. Berner Co.
R'dale

Received In Office

May 4 1971

Taylor Wilkins Sheriff

I have executed this summons

this 7-28 1971
by leaving a copy with BR

James McGill

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY N. J. Brown
DEPUTY SHERIFF

7-11 day of June
Not being in my county after diligent search
Taylor Wilkins, Sheriff
N. J. Brown, Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

Some R
R-Dale

STATE OF ALABAMA)

COUNTY OF MOBILE)

A F F I D A V I T

Before me, the undersigned authority in and for said State and County, personally appeared LEWIS GILMORE and JANIE GILMORE, who are known to me, and who after first being duly sworn, did depose and say as follows:

Our names are Lewis Gilmore and Janie Gilmore and we are the father and mother of Eugene Gilmore, age fifteen (15), a minor, who is in our care and custody.

We are filing this affidavit with the Circuit Court of Baldwin County, Alabama for the purpose of withdrawing funds in the amount of One Hundred and No/100 (\$100.00) Dollars of which said sum was recovered by our son in Case no: 9817.

The said minor child is in need of the aforesaid funds and we do declare that we make this application for such withdrawal with full understanding and agreement that we will use the funds so withdrawn for the sole benefit of our said child, his support, maintenance and education, and that we will not use any of said funds for ourselves, any other person, or any other purpose.

IN WITNESS WHEREOF, we have hereunto set our hands and seals on this the 21st day of April, 1972.

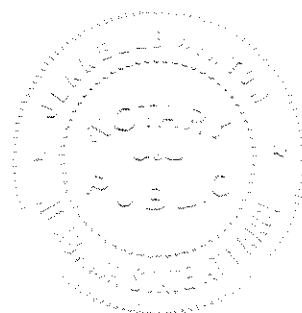
Lewis B Gilmore (SEAL)
LEWIS GILMORE

Janie O Gilmore (SEAL)
JANIE GILMORE

SUBSCRIBED and SWORN TO before me
on this the 21st day of April, 1972.

Janelle Hinton
NOTARY PUBLIC, State of Alabama
at Large.

Parent's Address:
P. O. Box 629
Century, Florida



Minor suit
Will you order
Money to be paid
to parents to
save going through
Probate
