

FOREMAN & BROWN
ATTORNEYS AT LAW
SUITE 214 FIRST NATIONAL BANK ANNEX
MOBILE 13, ALABAMA

ALEXANDER FOREMAN, JR.
ALTON R. BROWN, JR.
WILLIAM H. BRIGHAM

September 14, 1962

Honorable Hubert Hall, Judge
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

RE: Melvin A. Beckett vs. Curtis Roberts
Case No: 5208
Our File No: 62-2030-WHC

Dear Judge Hall:

As no appearance has been filed in the above styled case, numbered as shown above, we wish to withdraw our demand for jury trial and request that a judgment by default with leave to prove damages be entered for the plaintiff.

Yours very truly, .

FOREMAN & BROWN

BY *William H. Brigham*
William H. Brigham

WNB:jw

FOREMAN & BROWN
ATTORNEYS AT LAW
SUITE 214 FIRST NATIONAL BANK ANNEX
MOBILE 13, ALABAMA

HE 2-2792

ALEXANDER FOREMAN, JR.
ALTON R. BROWN, JR.
WILLIAM H. BRIGHAM

November 26, 1962

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

RE: Melvin A. Betterton vs. Curtis Roberts
Case No: 5208
and
James Betterton vs. Curtis Roberts
Case No: 5209
Our File No: 62-2030-WHC

Dear Mrs. Duck:

We are now prepared to prove the damages on the above referred to matter. You have previously suggested this will be necessary in order that a default judgment be entered. Therefore, if you will let us know of an opportune time for the judge's convenience, we will be in Bay Minette then. May we suggest early Wednesday morning, December 5, 1962. If this is not convenient, please let us know of the best time.

Whatever date you select, please subpoena the following witnesses, for that date.

George Scogin
Still Motor Company
Bay Minette, Alabama

Billy Pimple
Still Motor Company
Bay Minette, Alabama

Hubie Byrd
Byrd's Garage
Perdido, Alabama

Yours very truly,

FOREMAN & BROWN

BY *William H. Brigham*
William H. Brigham

WHB:jw

Done
11-27-62

S U M M O N S

STATE OF ALABAMA :

COUNTY OF BALDWIN:

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Curtis Roberts to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and then and there to plead, answer or demur to the complaint of Melvin A. Betterton.

Witness my hand this 19 day of July, 1962.

Deirdre J. Adams
CLERK

=====

C O M P L A I N T

MELVIN A. BETTERTON,	+	IN THE CIRCUIT COURT OF
Plaintiff,	+	BALDWIN COUNTY, ALABAMA
vs.	+	AT LAW
CURTIS ROBERTS,	+	
Defendant.	+	CASE NO. _____

COUNT ONE

Plaintiff claims of the Defendant the sum of Twenty Thousand and No/100 (\$20,000.00) Dollars, as damages for that heretofore and on, to-wit, the 18th day of November, 1961, while the Plaintiff was driving an automobile on and along Baldwin County Road No. 61, said highway being then and there a public highway in Baldwin County, Alabama, at a point south of Perdido, Alabama, approximately one-half mile north of its intersection with U. S. Highway 31, at said time and place the Defendant so wilfully operated the automobile which said Defendant was driving as to cause the same to run into, over, against, or upon said automobile that the Plaintiff was driving, and as a proximate result: Plaintiff suffered injuries and bruises on his legs; he suffered contusions of the legs and hips; he suffered multiple

fractures of the pelvis bone; he suffered contusions and lacerations of the ribs and chest; he was otherwise made sick, sore and lame, and he suffered physical pain and mental anguish; he required doctor and medical care for a long period of time and incurred expenses for the same and will in the future require further medical and doctors care, and will suffer expenses for the same; he was caused to lose time from his employment and will in the future lose further time from his employment at great expense.

Plaintiff alleges that all of the above described injuries and damages to Plaintiff were caused as a direct and proximate result of the wilful act of the Defendant in and about the operation of said automobile at the said time and place; hence this suit.

FOREMAN & BROWN
Attorneys for the Plaintiff

By William H. Brigham
William H. Brigham

Plaintiff respectfully demands a jury trial.

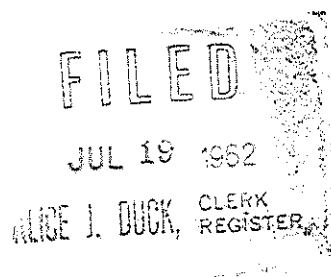
FOREMAN & BROWN
Attorneys for the Plaintiff

By William H. Brigham
William H. Brigham

Defendants may be served at:

Perdido, Alabama

E-4-7-25-62



no 5208

Melvin A. Bettorson

vs

Curtis Roberts

Received 19 day of July 1962
d on 25 day of July 1962
erved a copy of the within Curtis Roberts

service on

TAYLOR WILKINS, Sheriff

By W. A. Zolbert D.
Perdido

Sheriff claims 26 miles at
Ten Cents per mile Total \$ 2.60

TAYLOR
BY Zolbert

FILED

JUL 19 1962

ALICE J. DUCK, CLERK
REGISTER