

CATHERINE RODGERS JONES AND
JOSEPH JONES FOR THE USE AND
BENEFIT OF MID-STATES INSURANCE
INSURANCE COMPANY,

Plaintiffs,

Vs.

JAMES M. ENNIS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

CASE NO. 5219

Plaintiffs claim of the defendant the sum of, to-wit,
FIVE HUNDRED AND NO/100 (\$500.00) DOLLARS for that heretofore
and on, to-wit, the 29th day of July, 1961, the defendant James
M. Ennis, so negligently operated the automobile that he was then
and there driving on U. S. Highway # 90, Mobile Causeway, at or
near power pole # 30, said highway being a public highway in
Baldwin County, Alabama, so as to cause the same to run into, over,
upon or against the vehicle then and there being operated by
Raymond Rodgers and as a direct and proximate result of the
negligence of the defendant as aforesaid, the plaintiffs' automobile
was badly bent, broken and damaged and the value thereof permanently
depreciated, WHEREFORE, plaintiffs sue.

LYONS, PIPES & COOK
Attorneys for Plaintiffs.

By: Frank T. Pope, Jr.
Frank T. Pope, Jr.

FILED

JUL 26 1962

ALICE J. DUCK,

CLERK
REGISTERED

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS (1900-1957)

SAM W. PIPES, III

WALTER M. COOK

FRANK T. POPE, JR.

GORDON B. KAHN

IRWIN W. COLEMAN, JR.

G. SAGE LYONS

720.5219

July 25, 1962

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

Re: Jones for the Use and Benefit of Mid-States Insurance
Company vs. James M. Ennis.

Dear Mrs. Duck:

Enclosed please find original and two carbon copies of complaint in the above matter which we wish to file in your court. It would be greatly appreciated if you would acknowledge receipt of this receipt by returning one of the carbons to us with the filing date thereon.

We respectfully request that summons and complaint be held in abeyance until further notice.

Thanking you in advance, we are,

Very truly yours,

LYONS, PIPES & COOK



Frank T. Pope, Jr.

FTP/bb

Encl.

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