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 Robert L. Zech and Denver-Albuquerque Motor Transport, Inc., a Corporation, 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 Henry O. Newburn.

Witness my hand this _____ day of August, 1962.

Olio Clerk Ouck

HENRY O. NEWBURN,	X	
Plaintiff,	Ì	IN THE CIRCUIT COURT OF
vs.	X	IN THE CIRCUIT COURT OF
ROBERT L. ZECH and DENVER- ALBUQUERQUE MOTOR TRANSPORT, INC., a Corporation,		BALDWIN COUNTY, ALABAMA
		AT LAW
Defendants.	Ì	(5)

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Dollars (\$200.00) as damages for that, on to-wit: August 20, 1961, at or about 4:15 P. M. at a point on U. S. Highway Number 90 in Loxley, Baldwin County, Alabama, at the intersection of Highway 90 and Magnolia Street, the Defendant, Denver-Albuquerque Motor Transport, Inc., a Corporation, acting by and through its agent, servant or employee, the Defendant, Robert L. Zech, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently drove a motor vehicle into or against an automobile owned by the Plaintiff, Henry O. Newburn, and as a proximate result of the negligence of such Defendants the motor vehicle owned by the

CHASON & STONE

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ALICE J. DUCK, CLERK REGISTER

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HENRY O. NEWBURN,

Plaintiff,

vs.

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ROBERT L. ZECH and DENVER ALBUQUERQUE MOTOR TRANSPORT, INC., a Corporation,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

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CHASON & STONE

ATTORNEYS AT LAW BAY MINETTE, ALABAMA

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

JOHN CHASON
NORBORNE C. STONE, JR.
JOHN EARLE CHASON

PHONE 937-2191

June 1, 1963

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

Dear Mrs. Duck:

Re: Case #5229; Newburn vs. Zech

I was discussing this case with you yesterday after you received a letter from Mr. Alex T. Howard. I have today received a draft in payment of the amount due us and so we are now ready to dismiss this case.

Will you please dismiss this suit or have Judge Hall dismiss the same and will you then please advise Mr. Howard that the case has been dismissed. You received the court costs yesterday.

With best regards, we are

Yours very truly,

CHASON & STONE

Bv:

JC:bw

CC: Mr. Alex T. Howard
Attorney at Law
Merchants National Bank Building
Mobile, Alabama

STATE OF ALABAMA
IN THE CIRCUIT COURT: LAN SIDE

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Witness my hand this ____ day of August, 1962.

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1	Marith de Athlia PAGISTES			**
	MENRY O. NEWBURN,	X		
	Plaintiff,	I	PS-17, NY 2015, VICENTINOS	
esia L		X	IN THE CIRCUIT COURT OF	
	ROBERT L. ZECH and DEWVER-	I	BALDWIN COUNTY, ALABAMA	
	ALBIQUERQUE MOTOR TRANSPORT.	X		
	INC., a Corporation,	ĭ	AT LAW	
	Defendants.	X		
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COUNT ONE:

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CHASON & STONE

By: Attorneys for Plaintiff

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	HENRY	1 a.	NEWBURN,	X.		
			Plaintiff,	I	IN THE CIRCUIT COURT OF	
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) (1)				I	BALDWIN COUNTY, ALABAMA	ij
			. ZECH and DENVER- QUE MOTOR TRANSPORT	. 1		
			Corporation,	P	AT LAW	
			The said of the sa	A		
			Defendants.	I		. 4
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COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Dollars (\$200.00) as damages for that, on to-wit: August 20, 1961, at or about 4:15 P. M. at a point on U. S. Highway Number 90 in Loxley, Baldwin County, Alabama, at the intersection of Highway 90 and Magnolia Street, the Defendant, Denver-Albuquerque Motor Transport, Inc., a Corporation, acting by and through its agent, servant or employee, the Defendant, Robert L. Zech, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently drove a motor vehicle into or against an automobile owned by the Plaintiff, Henry O. Newburn, and as a proximate result of the negligence of such Defendants the motor vehicle owned by the

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ALICE J. DUCK, CLERK REGISTER

By: Aytorneys for Plaintiff

Berner 21, Colo.

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Witness my hand this ____ day of August, 1962.

I HENRY O. NEWBURN. Plaintiff. X IN THE CIRCUIT COURT OF Ĭ vs. BALDWIN COUNTY, ALABAMA I ROBERT L. ZECH and DENVER-ALBUQUERQUE MOTOR TRANSPORT, Ĭ INC., a Corporation. AT LAW X Defendants. X

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Dollars (\$200.00) as damages for that, on to-wit: August 20, 1961, at or about 4:15 P. M. at a point on U. S. Highway Number 90 in Loxley, Baldwin County, Alabama, at the intersection of Highway 90 and Magnolia Street, the Defendant, Denver-Albuquerque Motor Transport, Inc., a Corporation, acting by and through its agent, servant or employee, the Defendant, Robert L. Zech, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently drove a motor vehicle into or against an automobile owned by the Plaintiff, Henry C. Newburn, and as a proximate result of the negligence of such Defendants the motor vehicle owned by the

CHASON & STONE

By: Atyorneys for Plaintiff

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Witness my hand this day of August, 1962.

HENRY O. NEWBURN. Ž Plaintiff, IN THE CIRCUIT COURT OF I VS. BALDWIN COUNTY, ALABAMA I ROBERT L. ZECH and DENVER-ALBUQUERQUE MOTOR TRANSPORT, X AT LAW INC., a Corporation, I Defendants. I

COUNT ONE:

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CHASON & STONE

By: Aytorneys for Plaintiff

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BALDWIN COUNTY

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Witness my hand this ____ day of August, 1962.

- Olice Junk

HENRY	O.	NEWBURN,	I							
		Plaintiff,	I						1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	
vs.		and the second of the second o	X	e de la companya de l	IN	THE	CIR	CUIT	COURT	of
ROBERI	* #	. ZECH and DENVER-	I		BAL	.DW IN	CO	JNTY	, ALAB	AMA
	ER	. ZECH and DENVER- QUE MOTOR TRANSPORT, Corporation.	I	100 m			Arp	law		
		Defendants.	X				4 % 44	A. S. R. 11		
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COUNT ONE:

The Plaintiff claims of the Defendants the sum of Two Hundred Dollars (\$200.00) as damages for that, on to-wit: August 20, 1961, at or about 4:15 P. M. at a point on U. S. Highway Number 90 in Loxley, Baldwin County, Alabama, at the intersection of Highway 90 and Magnolia Street, the Defendant, Denver-Albuquerque Motor Transport, Inc., a Corporation, acting by and through its agent, servant or employee, the Defendant, Robert L. Zech, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently drove a motor vehicle into or against an automobile owned by the Plaintiff, Henry O. Newburn, and as a proximate result of the negligence of such Defendants the motor vehicle owned by the

CHASON & STONE

By: The Care Chaso-Attorneys for Plaintiff

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BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert L. Zech and Denver-Albuquerque Motor Transport, Inc., a Corporation, 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 Henry O. Newburn.

Witness my hand this 6 day of August, 1962.

Aliel J. Duck

HENRY O. N	EWBURN,	X							
	Plaintiff,	. I							
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	ZECH and DENVER— E MOTOR TRANSPORT	Y							
INC., a Co		, .		1.4		AT	LAW		
	Defendants.	I							
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CHASON & STONE

By: Attorneys for Plaintiff

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