

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

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.

Allice J. Duck
Clerk

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

5029

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

Plaintiff was damaged in this: the rear bumper was bent, damaged or broken; the rear end panel was bent, damaged or broken; the floor panel and right quarter panel was bent, damaged or broken; the tail lights were bent, damaged or broken, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON & STONE

FILED

AUG 6 1962

ALICE J. DUCK, CLERK
REGISTER

By:

John Earle Chason
Attorneys for Plaintiff

5229

HENRY O. NEWBURN,

Plaintiff,

vs.

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

* * * * *

FILED

AUG 6 1962

ANGEL DUCK, CLERK
REGISTER

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

By: 

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

Plaintiff was damaged in this; the rear bumper was bent, damaged;
STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

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Witness my hand this 6 day of August, 1962.

FILED

AUG 6 1962

William J. Duck
Clerk

HENRY O. NEWBURN,

Plaintiff,

vs.

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

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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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CHASON & STONE

By:

John Earle Chason
Attorneys for Plaintiff

FILED

AUG 6 1962

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA

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Alice D. Duck
Clerk

HENRY O. NEWBURN,

Plaintiff,

vs.

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

Defendants.

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IN THE CIRCUIT COURT OF

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CHASON & STONE

By:

John Earle Chason
Attorneys for Plaintiff

FILED

AUG 6 1962

ALICE J. DUCK, CLERK
REGISTER

Zech - 7220 Alan Drive
Denver 21, Colo.

Denver - Abber —
Denver Colo.

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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Alice J. Duck
Clerk

HENRY O. NEWBURN,

Plaintiff,

vs.

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

Defendants.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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CHASON & STONE

By: John Earle Chason
Attorneys for Plaintiff

FILED

AUG 8 1962

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

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Alice J. Clark
Clerk

HENRY O. NEWBURN,

Plaintiff,

vs.

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

Defendants.

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CHASON & STONE

By: John Earl Chason
Attorneys for Plaintiff

FILED

AUG 6 1962

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

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Alice J. Luck
Clerk

HENRY O. NEWBURN,	I	
Plaintiff,	I	
vs.	I	IN THE CIRCUIT COURT OF
	I	BALDWIN COUNTY, ALABAMA
ROBERT L. ZECH and DENVER-	I	
ALBUQUENQUE MOTOR TRANSPORT,	I	
INC., a Corporation,	I	AT LAW
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CHASON & STONE

By: John Earl Chason
Attorneys for Plaintiff

FILED

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ALICE J. DUCK, CLERK
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Alice J. Clark
Clerk

HENRY O. NEWBURN,

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INC., a Corporation,

Defendants.

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CHASON & STONE

By:

John Earle Chason
Attorneys for Plaintiff

FILED

AUG 6 1962

ALICE I. DUCK, CLERK
REGISTER