

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

May 29, 1963

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

Re: William F. Foreman, Jr. vs. James Salac, Jr., In the
Circuit Court of Baldwin County, Alabama, At Law,
Case Number: 5425

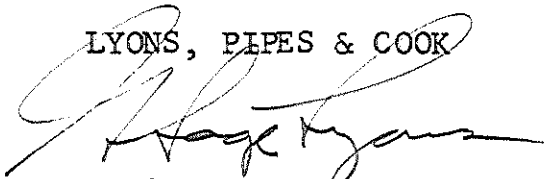
Dear Mrs. Duck:

On behalf of the plaintiff, please enter a non-suit in the
above-styled case and submit cost bill at this time as the
parties have entered into a settlement agreement.

Thank you for your attention to this matter.

Very truly yours,

LYONS, PIPES & COOK



G. Sage Lyons

GSL:hh

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G. SAGE LYONS

January 10, 1963

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

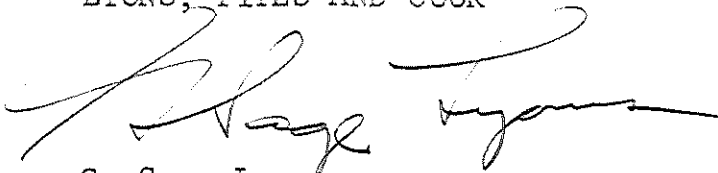
Re: William F. Foreman, Jr. vs. James Salac, Jr.
In the Circuit Court of Baldwin County, Alabama
Case No. _____

Dear Mrs. Duck:

Enclosed herewith please find the original and two carbon copies of the Complaint, which I request that you file with the Circuit Court of Baldwin County, Alabama. Your acknowledgement of receipt will be appreciated.

Very truly yours,

LYONS, PIPES AND COOK



G. Sage Lyons

GSL/cg

Encls.

WILLIAM F. FOREMAN JR.)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
Plaintiff)	
-VS-)	AT LAW.
)	
JAMES SALAC, JR.)	CASE NO. 5425
Defendant)	

PLEAS

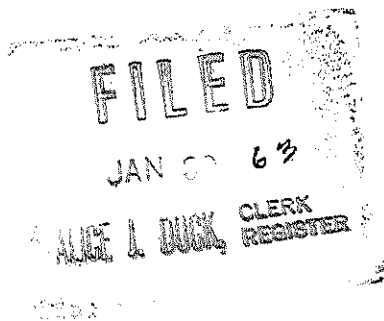
Comes now the Defendant in the above styled cause, and for answer to the Bill of Complaint filed herein, pleads separate and severally, as follows:

ONE:

As to Count One of the Bill of Complaint, the Defendant says that he is not guilty of the matters therein alleged.

TWO:

That the Plaintiff was guilty of negligence at the time and place complained of in his complaint, which proximately contributed to his alleged damages, in that the Plaintiff so negligently operated his motor vehicle as to cause or allow the same to run into, upon, or against the motor vehicle which was then and there being driven by the Defendant, hence he should not recover.



[Handwritten Signature]
Attorney for Defendant

WILLIAM F. FOREMAN, JR.,

Plaintiff

vs.

JAMES SALAC, JR.,

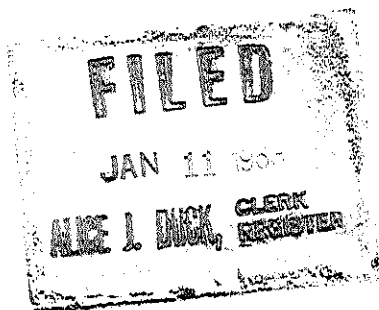
Defendant

) IN THE CIRCUIT COURT OF BALDWIN
) COUNTY, ALABAMA
)

CASE NO. 5425-

COMPLAINT

Plaintiff claims of the defendant the sum of FIVE HUNDRED AND NO/100 (\$500.00) DOLLARS, as damages, for that heretofore and on, to-wit, August 4, 1962, while the plaintiff's vehicle was being operated on U. S. Highway 90, a public highway in the State of Mississippi, approximately one mile west of the Alabama-Mississippi State line, in the State of Mississippi, the defendant so negligently operated the vehicle he was driving as to run into, upon or against the plaintiff's vehicle and as a proximate result thereof, the plaintiff was injured in this: his automobile was bent, smashed, broken and otherwise damaged, rendered permanently less valuable, and he was deprived of the use thereof for a period of time: for all of which plaintiff claims damages as aforesaid.



LYONS, PIPES AND COOK
Attorneys for the Plaintiff

By: _____

G. Sage Lyons

Defendant's address:
Route 1, Box 179
Fairhope, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5425

TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James Salac, Jr

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 Salac, Jr, Defendant.

by William F. Foreman, Jr

Plaintiff.

Witness my hand this 11 day of January 19 63

Clerk

E. J. - 1-15-63

No. 5425

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

WILLIAM F. FOREMAN, Jr

Plaintiffs

vs.

JAMES SALAC, Jr

Defendants

SUMMONS and COMPLAINT

Filed 1-11-, 1963

Alice J. Duck, Clerk

Lynn Pipes & Cook
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1 Box 179, Fairhope, Ala.
RECEIVED IN OFFICE

January 11, 1963

Sheriff

I have executed this summons

this 15th day of Jan, 1963
by leaving a copy with

James Salac, Jr

Sheriff claims 76 miles at

Ten Cents per mile Total \$ 7.60

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred L. Lister Deputy Sheriff

I hope