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Mrs. Alice M. Cook  
Clerk of Circuit Court  
Bay Minette, Alabama

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JOHN L. NEWLAND SERVICE CO., INC.  
ATTN: Mr. Day  
814 Morris Avenue  
PAINOKE, ALABAMA

SUBJECT:

Banks - vs - Cook

DATE:

11 1 51

Message - Reply

FOLD A THIS IS NCR (NO CARBON REQUIRED) PAPER.

{ JUST TYPE (OR WRITE) ON ORIGINAL. YOUR IMPRESSION  
WILL AUTOMATICALLY APPEAR ON COPIES BENEATH.

Form 82 New England Business Service, Inc. Townsend, Mass.

Dear Mrs. Cook:

5798

Enclosed you will find enclosed 1 copy of the  
above. Please file and have served.

Sincerely,

SIGNED:

DATE OF REPLY:

REPLY TO:

SIGNED:

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

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JOE BANKS	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA,
-VS-	)	
PRESTON DALE	)	AT LAW.
Defendant	)	<i>70,5798</i>
	)	

COUNT ONE:

Plaintiff claims of the Defendant, the sum of THREE HUNDRED THIRTY-TWO and 40/100 DOLLARS (\$332.40), as damages for that heretofore on, to-wit: The 23rd day of March, 1963, at or about 8 P. M., the Plaintiff's automobile was being operated along and upon the Daphne\_Loxley Highway at at point thereon at the intersection at Belforest Alabama, which was then and there a public highway in Baldwin County, Alabama, where said Plaintiff's automobile had a right to be, and while said Plaintiff's automobile was being operated and driven along the said Daphne-Loxley Highway, the Defendant so negligently operated a motor vehicle as to cause or allow it to run into or upon or against the automobile of the Plaintiff, causing great damages and injuries to the Plaintiff's automobile; and that the frame was bent and was' knocked out of alignment, the left bumper assembly was smashed, bent and otherwise damaged, the back window glass was smashed and broken, the deck lid was smashed, bent and otherwise damaged, the rear tail lights were broken, the gas tank was bent and torn away from the said body of the said car, and that the Plaintiff's automobile was rendered a total loss, all to the damage of the Plaintiff as aforesaid, The Plaintiff alleges that the said damages to his said automobile were proximately caused by the negligence of the Defendant, in that he negligently caused, allowed or permitted his said automobile to run upon, over or against the automobile of the Plaintiff and as a proximate consequence thereof, the Plaintiff's automobile was damaged and rendered a total loss as aforesaid.

FILED

NOV 4 1963

ALICE A. DUCK

CLERK

*[Signature]*  
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon PRESTON DALE

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 -----

PRESTON DALE

-----, Defendant.-----

by -----

Joe Banks

-----, Plaintiff.-----

Witness my hand this 4 day of Nov 1963

EX-11-16-63

Deirdre French, Clerk

No. 5798

Page \_\_\_\_\_

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

JOE BANKS

Plaintiffs

vs.

PRESTON DALE

Defendants

**Summons and Complaint**

Filed 11-4 1963

Alvin J. Cook Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Montrose, Alabama

Received In Office

Nov. 4, 1963

Taylor Wilkins

Sheriff.

I have executed this summons

this 6th of Nov 1963

by leaving a copy with

Preston Dale

Sheriff claims 55 dollars at

Ten Cents per mile total 5.50

TAYLOR WILKINS, Sheriff

BY

JM Eastburn  
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

JM Eastburn  
Montrose, Ala.

Deputy Sheriff.

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Floyd G. Thompson 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 the same, then and there to answer the complaint of Bryan-Smith Oil Company, Inc., a corporation.

WITNESS my hand, this 4 day of November, 1963.

Alice J. Duck  
Clerk

The defendant may be served at  
Marlowe, Alabama.

\* \* \* \* \*

BRYAN-SMITH OIL COMPANY, INC.,  
a Corporation,

Plaintiff,

VS.

FLOYD G. THOMPSON,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

5799

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant FORTY TWO HUNDRED DOLLARS (\$4200.00), due from him by account on the first day of November, 1962, which sum of money, with the interest thereon, is still unpaid.

[Signature]  
Attorney for Plaintiff

FILED

NOV 4 1963

ALICE J. DUCK, CLERK  
REGISTER