

WALTER D. HICKS,

Plaintiff,

vs.

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON,

Defendant.

I

I

I

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 5622

ANSWER:

Now comes the Plaintiff, by his Attorneys of Record, and files this, his answer to Paragraph 4, being the Defendant's Plea of Recoupment, and for answer to said Plea of Recoupment, says as follows:

1. Not guilty.

2. That at the time and place complained of in said complaint, the said Annie Mae Jeter was herself guilty of contributory negligence which proximately contributed to the injuries complained of, in that she so negligently operated her motor vehicle on Highway 31 North, so as to cause or allow her said motor vehicle to run into, upon or against the motor vehicle operated by the wife of the Plaintiff, Walter D. Hicks, which said negligence proximately contributed to the injuries and damages complained of in the complaint, hence the said Annie Mae Jeter should not recover.

MASHBURN AND OWENS

FILED

JAN 22 1964

ALICE L. DICK, CLERK
REGISTER

By:

James Owens, Jr.
Attorneys for Plaintiff.

WALTER D. HICKS,

Plaintiff,

vs.

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON,

Defendant.

ANSWER

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 5622

FILED

JAN 22 1964

ALICE I. DUCK, CLERK
REGISTER

MASHBURN & OWENS

ATTORNEYS AT LAW

DAHLBERG BUILDING

BAY MINETTE, ALABAMA

WALTER D. HICKS

Plaintiff

vs

ANNIE MAE JETER, Formerly
known as ANNIE MAE AARON

Defendant

X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 5622

Comes C. LeNoir Thompson, attorney for Annie Mae Jeter, formerly known as Annie Mae Aaron, defendant in said cause and shows unto this Honorable Court as follows:

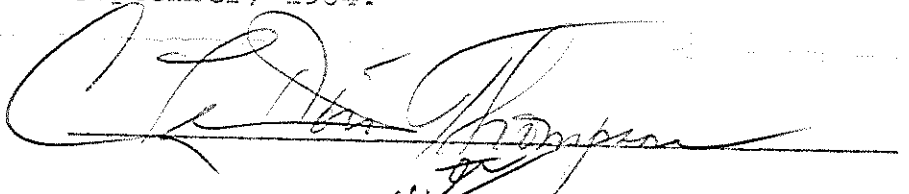
That the said Sara Luther is Bookkeeper for Still Motor Company, Inc., a corporation, Ford dealer in Bay Minette, Alabama; and,

That the said Sara Luther in her capacity as said bookkeeper, has in her possession or under her control records pertinent to the repair of a 1960 Ford Fairlane, 2 Dr. automobile, Motor No. 0U31V139151 on or about November 13, 1962, or November 17, 1962, and owned by Mary Hicks or Walter D. Hicks, which records are pertinent and material to the case of the said defendant; and,

That the issuance of a subpoena duces tecum is necessary, the ends of justice requiring it, in order that said records may be available to said defendant at the next term of the Circuit Court of Baldwin County, to-wit, September 15, 1964.

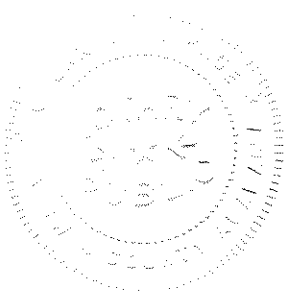
WHEREFORE, your affiant moves this Honorable Court for an order to the Clerk of said court to issue to the said Sara Luther, as bookkeeper of Still Motor Company, Inc., a subpoena duces tecum requiring her to produce in said Court on the 15th day of September, 1964, and thereafter as ordered by said Court, the said records herein above described.

Dated this 14 day of September, 1964.



Sworn to and subscribed before me this 14 day of September, 1964.


Notary Public, Baldwin County, Alabama



*Filed 9-14-64
Cliff Leach
clerk*

WALTER D. HICKS

X

Plaintiff

)(

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON

X

AT LAW

NO. 562-2

X

Defendant

X

Comes the defendant in the above styled cause and amends her
answer heretofore filed in said complaint to read as follows:

-1-

Not guilty.

-2-

For further answer to said count this defendant says that the
plaintiff ought not to recover in this case, for that on the occasion
complained of the plaintiff's agent, servant or employee was herself
guilty of negligence proximately contributing to plaintiff's alleged
damages, in this:

Plaintiff's agent, servant or employee was operating plaintiff's
said automobile proceeding East on U. S. Highway 31 at the point and
place complained of and defendant avers that plaintiff's agent, ser-
vant or employee while operating said automobile brought said auto-
mobile to a stop on the public highway, to-wit, U. S. Highway No.
31 and negligently allowed said automobile to remain in the East
bound traffic lane of said highway and negligently failed to give any
sign or signal of said stopping so that due to said negligence the
said automobile driven by defendant collided with the said automobile
which had been for an indeterminate period without motion on U. S.
Highway 31 and the said illegal stopping of plaintiff's automobile
on the said highway without sign or signal contributed to the said
plaintiff's alleged damages; hence the plaintiff ought not to recover
in this suit.

-3-

Now comes the defendant and for answer to the complaint, and
to each count thereof separately and severally, says there has been
an accord and satisfaction of the demand upon which this suit is
brought in this:

That heretofore, on to-wit, the 1st day of November, 1962,
and before the filing of this suit; there was a bona fide dispute

between the plaintiff and the defendant as to the amount of the plaintiff's claim; that the defendant prior to the filing of the suit paid to the benefit of the plaintiff on to-wit, the 17th day of November, 1962, in cash, the sum of \$50.00; that the plaintiff accepted said payment of said sum in full satisfaction and discharge of said claim; wherefore, the plaintiff ought not to maintain this action.

-4-

Comes the defendant, Annie Mae Aaron and says that at the time this action was commenced the plaintiff was indebted to her in the sum of \$1,000.00 for that on to-wit, November 1, 1962, at approximately 4:30 P.M. plaintiff's 1960 Ford Fairlane, 2 Dr. Sedan, subject of this action was being driven North or East on U. S. Highway No. 31 which is a public highway in Baldwin County, Alabama, at a point or place about two miles North of Bay Minette, Alabama, when the agent, servant or employee of said plaintiff so negligently operated plaintiff's automobile, motor vehicle which she was then and there driving, negligently bringing same to rest on the pavement and in the right hand driving way on said highway and negligently letting said vehicle remain in said highway without sign or signal so that defendant's automobile collided with said plaintiff's automobile illegally stopped as alleged, and the defendant's automobile was damaged as follows: the front fender, radiator, grill, front wheels and front end generally, and motor damaged so that defendant's said automobile was a total loss and defendant was deprived of the use of her automobile which she used in transportation to and from her employment and was without the use of her said automobile for a period of approximately five months to the further damage of the said defendant, all in the total amount of \$1,000.00 and your said defendant alleges that all of her said damages were the direct and proximate consequence and result of the negligence of plaintiff's agent, servant or employee at and about the operation of plaintiff's said automobile at the time and place heretofore set forth all to the damage of the said defendant in the amount of \$1,000.00 which the defendant hereby offers to set off against the demand of the plaintiff and she claims judgment for the excess.

FILED

DEC 4 1962

THOMPSON & WHITE

444

ALICE J. DICK, CLERK
REGISTER

BY

C. L. Thompson
Attorneys for defendant

WALTER D. HICKS, I
Plaintiff, I
vs. I
ANNIE MAE JETER, formerly I
known as ANNIE MAE AARON I
Defendant. I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5622

DEMURRER:

Now comes the Plaintiff in the above styled cause and files this, his demurrer, to paragraph two of the Defendant's Answer, and as grounds therefor, assigns the following separately and severally:

1. That said paragraph does not state a good defense.
2. That the facts set forth in paragraph 2 do not set forth a good plea of contributory negligence.
3. That it does not appear that said automobile allegedly parked on the highway in paragraph 2, was so parked between the hours of one-half hour before sunset or one-half hour after sunrise.
4. That it does not appear from said paragraph what time of day the Plaintiff's agent allegedly allowed and let the automobile to remain parked in the traffic lane of said highway. That the automobile was illegally parked, is but a conclusion of the pleader.

Now comes the Plaintiff, by his Attorney, and files this his demurrer to paragraph 4, being the Defendant's Cross-Bill, and assigns as grounds therefor, the following, both separately and severally:

1. That said paragraph does not state a good defense.
2. That the facts set forth in paragraph 4 do not set forth a good plea of contributory negligence.
3. That it does not appear that said automobile allegedly parked on the highway in paragraph 4, was so parked between the hours of one-half hour before sunset or one-half hour after sunrise.
4. That it does not appear from said paragraph what time of day the Plaintiff's agent allegedly allowed and let the automobile to remain parked in the traffic line of said highway. That

the automobile was illegally parked, is but a conclusion of the pleader.

MASHBURN & OWENS

By: *J. Howard Owens, Jr.*

Attorneys for Plaintiff.

RECORDED

FILED

FILED

OCT 4 1933

ALICE J. DICK, CLERK
REGISTER

RECORDED

INDEXED

FILED

DEMURRER

WALTER J. HICKS,

Plaintiff,

vs

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 5622

FILED
OCT 4 1938
MAE J. DIX, CLERK
REGISTER

WALTER D. HICKS

Plaintiff

vs

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5622

Comes the defendant in the above styled cause and for answer to said complaint filed in said cause shows unto this Honorable Court as follows:

-1-

Not guilty.

-2-

For further answer to said count this defendant says that the plaintiff ought not to recover in this case, for that on the occasion complained of the plaintiff's agent, servant or employee was herself guilty of negligence proximately contributing to plaintiff's alleged damages, in this:

Plaintiff's agent, servant or employee was operating plaintiff's said automobile proceeding East on U. S. Highway 31 at the point and place complained of and defendant avers that plaintiff's agent, servant or employee while operating said automobile brought said automobile to a stop on the public highway, to-wit, U. S. Highway No. 31 and continued to let the said automobile remain parked in the East or North bound traffic lane of the said highway for an indefinite period without sign or signal of said stopping or parking so that the said automobile driven by defendant collided with the said automobile which had been for an indeterminate period without motion on U. S. Highway 31 and the said illegal stopping of plaintiff's automobile on the said highway without sign or signal contributed to the said plaintiff's alleged damages; hence the plaintiff ought not to recover in this suit.

-3-

Now comes the defendant and for answer to the complaint, and to each count thereof separately and severally, says there has been an accord and satisfaction of the demand upon which this suit is brought in this:

That heretofore, on to-wit, the 1st day of November, 1962,

and before the filing of this suit; there was a bona fide dispute between the plaintiff and the defendant as to the amount of the plaintiff's claim; that the defendant prior to the filing of the suit paid to the benefit of the plaintiff on to-wit, the 17th day of November, 1962, in cash, the sum of \$50.00; that the plaintiff accepted said payment of said sum in full satisfaction and discharge of said claim; wherefore the plaintiff ought not to maintain this action.

-4-

Comes the defendant, Annie Mae Aaron and says that at the time this action was commenced the plaintiff was indebted to her in the sum of \$1,000 for that on to-wit, November 1, 1962, at approximately 4:30 P.M. plaintiff's 1960 Ford Fairlane, 2 Dr. Sedan, subject of this action was being driven North or East on U. S. Highway No. 31 which is a public highway in Baldwin County, Alabama, at a point or place about two miles North of Bay Minette, Alabama, when the agent, servant or employee of said plaintiff so negligently operated plaintiff's automobile, motor vehicle which she was then and there driving bringing same to rest on the pavement and in the driving way on said highway and negligently letting said vehicle remain in said highway without sign or signal so that defendant's automobile collided with said plaintiff's automobile illegally parked as alleged and the defendant's automobile was damaged as follows: the front fender, radiator, grill, front wheels and front end generally, and motor damaged so that defendant's said automobile was a total loss and defendant was deprived of the use of her automobile which she used in transportation to and from her employment and was without the use of her said automobile for a period of approximately five months to the further damage of the said defendant, all in the total amount of \$1,000 and your said defendant alleges that all of her said damages were the direct and proximate consequence and result of the negligence of plaintiff's agent, servant or employee at and about the operation of plaintiff's said automobile at the time and place heretofore set forth all to the damage of the said defendant in the amount of \$1,000 which the defendant hereby offers to set off against the demand of the plaintiff and the claims judgment for the excess.

THOMPSON & WHITE

BY:

Attorneys for defendant.

FILED

SEP 10 1963

ALICE J. DUCK, CLERK
REGISTER

440

WALTER D. HICKS	X	
Plaintiff	X	
vs	X	IN THE CIRCUIT COURT OF
ANNIE MAE JETER, formerly	X	BALDWIN COUNTY, ALABAMA
known as ANNIE MAE AARON	X	AT LAW NO. _____
Defendant	X	

Comes the defendant in the above styled cause and demurs to the complaint filed in said cause and for demurrer separately and severally to the complaint filed shows unto this Honorable Court as follows:

-1-

That said complaint fails to state a cause of action.

-2-

That for aught alleged in said complaint, the said plaintiff's automobile was illegally parked on the public highway.

-3-

That for aught alleged in said complaint, said plaintiff stopped without warning.

-4-

That for aught alleged in said complaint said plaintiff failed to signal the stopping of the motor vehicle on the highway by the said plaintiff.

-5-

That for aught alleged in said complaint plaintiff failed to allege that he had a legal right for his automobile to be at said time and place where said automobile was parked.

-6-

Plaintiff fails to allege that he was driving said automobile.

-7-

Said count fails to allege the violation of any duty owed by the defendant to the plaintiff.

-8-

Said count fails to allege facts showing the violation of any duty owed by the defendant to the plaintiff.

-9-

For aught that appears from said count, the plaintiff was not at a place where he had a legal right to be at the time and place

complained of.

THOMPSON & WHITE

BY: *C. L. Thompson*
Attorneys for defendant

Defendant demands trial by jury.

THOMPSON & WHITE

BY: *C. L. Thompson*
Attorneys for defendant

FILED

JUL 26 1963

ALICE J. DUCK, CLERK
REGISTER

WALTER D. HICKS,

Plaintiff,

VS.

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

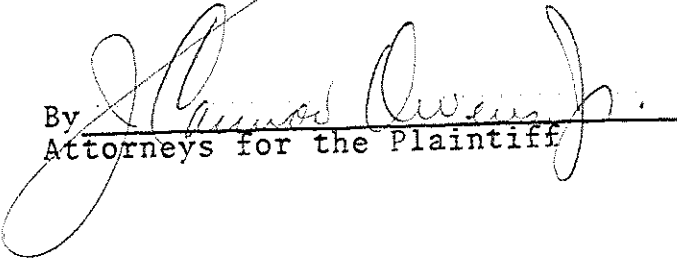
AT LAW

NO. 5622

Plaintiff claims of the Defendant the sum of \$550.00 as damages for that, thertofore, on to-wit: November 1, 1962, at approximately 4:30 P.M., the Plaintiff's 1960 Ford Fairlane 2-Door, bearing Motor No. OU314139151 was being driven North on U.S. Highway No. 31, which is a public highway in Baldwin County, Alabama, at a point about two miles North of Bay Minette, Alabama, when the Defendant, Annie Mae Jeter, formerly known as Annie Mae Aaron, so negligently operated an automobile vehicle which she was then and there driving as to cause, permit or allow her said vehicle to run into the rear of Plaintiff's vehicle, and as the proximate result and consequence of the Defendant's negligence as aforesaid, the Plaintiff's said automobile was then and there damaged as follows: the rear trunk lid was bent and damaged, the rear body end panel was bent and damaged, the rear bumper box was bent and damaged, the fuel tank was completely ruined, the rear tail lamp was damaged, the chrome bumper bolt was damaged, the rear bumper across the right left was damaged, the rear bumper across the center arm was damaged, the rear exterior panels were damaged, the front seat tracks right and left were bent, broken and damaged, the front seat side panel on the right hand and center were bent, broken and damaged, the motor support on the left hand side was bent and damaged, the back rear seat bracket was damaged, the tail pipe was damaged, the rear deck floor was bent and broken and damaged, the frame was damaged, the front seat back rest right and left was damaged, and the radiator was damaged. Further, the Plaintiff was deprived of the use of his car which was used in and about his business for a long period of time, to-wit: for six weeks, to the further damage to the Plaintiff, all in the total amount of \$550.00

And the Plaintiff alleges all of his said damages were the direct and proximate consequence and result of the Defendant's negligence in and about the operation of her said automobile vehicle at the time and place heretofore set forth, all to the damages of the Plaintiff in the amount of \$550.00, hence this suit.

MASHBURN & OWENS

By 
Attorneys for the Plaintiff

FILED

JUL 2 1918

ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

JULY

TERM, 19 63.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

ANNIE MAE JETER, formerly known as

ANNIE MAE HICKS

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 ANNIE MAE JETER,
formerly known as ANNIE MAE AARON, Defendant.

by WALTER D. HICKS

Plaintiff.

Witness my hand this 2 day of July 19 63.

Clerk

64-7-10-63
Defendant resides on Route 2, Bay Minette, first house on right
beyond Hog's Creek.

No. 5622

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

WALTER D. HICKS

vs.

Plaintiffs

ANNIE MAE JETER, formerly

known as ANNIE MAE HICKS

Defendants

SUMMONS and COMPLAINT

Filed

FILED

19 63

JUL 2 1963

Clerk

ALICE J. DUCK, CLERK
REGISTER

MASHBURN & OWENS

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

July 2, 1963

, Sheriff

I have executed this summons

this

July 10, 1963

by leaving a copy with

Annie Mae Jeter

July 2 Deduct
for the defendant
John B. Robinson
Tramm

Taylor Wilkins Sheriff
W. A. Lambert Deputy Sheriff

om.

WALTER D. HICKS,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW. NO. _____
ANNIE MAE JETER, formerly)	
known as ANNIE MAE AARON,)	
Defendant.)	

ANSWERS TO INTERROGATORIES PROPOUNDED BY THE
DEFENDANT TO THE PLAINTIFF:

Now comes the Plaintiff and files these, his answer to
the Interrogatories propounded to him by the Defendant, and for
answer says as follows:

1. Walter D. Hicks.
2. Yes
3. No.
4. Mary V. Hicks.
5. Yes.
6. No.
7. Not applicable.
8. Yes.
9. No.
10. Not applicable.
11. Carpenter.
12. No.
13. No.
14. I did not witness the accident and cannot answer this
question.
15. This has not been compromised or settled.
16. No.
17. Yes.
18. Still Motor Company.
19. Not material
20. Not material
21. Yes.

FILED

JAN 28 1964

ALICE J. DICK, CLERK
REGISTER

Walter D. Hicks
Walter D. Hicks.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority within and for said County in said State, personally appeared Walter D. Hicks, who first being duly sworn, deposes and says as follows: That he has read over and signed the foregoing answers to interrogatories propounded to him by the Defendant in the within styled cause and that the answers thereto are true and correct.

Walter D. Hicks

Sworn to and subscribed before me
on this the 22nd day of January, 1964.

James Owen, Jr.

Notary Public, Baldwin County, Alabama.

WALTER D. HICKS	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs	X	BAWDWIN COUNTY, ALABAMA
ANNIE MAE JETER, formerly known as ANNIE MAE AARON	X	AT LAW NO. _____
Defendant	X	
	X	

Comes the defendant in the above styled cause and propounds the following interrogatories to the plaintiff, Walter D. Hicks:

1. State your name.
2. Are you the owner of the motor vehicle on which you allege damages resulting from that certain accident on November 1, 1962, subject of this suit?
3. If your answer is "yes", state whether or not you were the driver of the said automobile at the time of the accident.
4. If you were not the driver, then state the name of the driver of the automobile.
5. Was the driver operating the automobile with your consent?
6. Had the operator of the automobile been involved in any other wrecks so far as you know?
7. If your answer is "yes", state the date and location of those accidents.
8. Does the driver of your automobile have a drivers license and did the driver have one on the date of the accident?
9. Do you have a motor vehicle other than the automobile that was damaged?
10. Did you have such motor vehicle on the date of this accident?
11. State the kind of business in which you are engaged?
12. Is it not true that you operated a pickup truck while the damaged automobile was primarily for the use of your wife?
13. Do you know whether or not the driver of your automobile stopped the vehicle on the highway immediately prior to the accident?
14. Was there room on the shoulder of the road to the right of your automobile where the driver of your vehicle could have pulled off to allow traffic to pass and thereby leaving the

road clear?

15. Do you know whether or not this cause has been settled by compromise between the defendant and your wife?
16. Do you know whether or not your wife accepted any money in a compromise settlement of this accident on which you are suing?
17. Have you had your car repaired?
18. If so, state the name of the shop repairing same.
19. State whether anyone has paid you, your wife or the shop for said repairs.
20. If your answer is "yes" to the preceding question, state the name or names of the individuals or corporations paying for said repairs.
21. Do you still own this automobile?

THOMPSON & WHITE

BY:

C. L. Thompson
Attorneys for defendant

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am one of the Attorneys of Record for the defendant in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the plaintiff to the foregoing interrogatories will, if truthfully made, be material evidence for the defendant on the trial of said cause.

C. L. Thompson
C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 24 day of Aug, 1963.

FILED

AUG 21 1963

Henry A. Page
Notary Public

ALICE J. DUCK, CLERK
REGISTER

Accepted service
8/21/63
J. Cannon

9-15-64
6:00 P.M.

We, the jury, find the issues in
favor of the Defendant.

John B. Robinson
Foreman.

WALTER D. HICKS

X

Plaintiff

X

IN THE CIRCUIT COURT OF

VS

X

BALDWIN COUNTY, ALABAMA

ANNIE MAE JETER, Formerly
known as ANNIE MAE AARON

X

AT LAW NO. 5622

Defendant

X

X

Comes C. Lenoir Thompson, attorney for Annie Mae Jeter, formerly known as Annie Mae Aaron, defendant in said cause and shows unto this Honorable Court as follows:

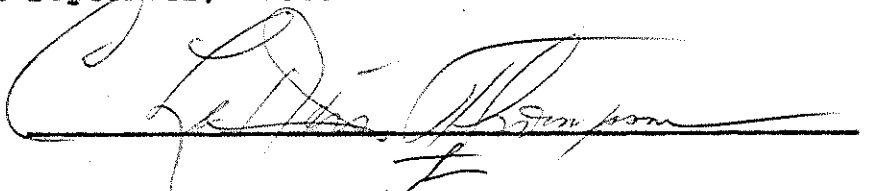
That the said Sara Luther is Bookkeeper for Still Motor Company, Inc., a corporation, Ford dealer in Bay Minette, Alabama; and,

That the said Sara Luther in her capacity as said bookkeeper, has in her possession or under her control records pertinent to the repair of a 1960 Ford Fairlane, 2 Dr. automobile, Motor No. 0U31V139151 on or about November 13, 1962, or November 17, 1962, and owned by Mary Hicks or Walter D. Hicks, which records are pertinent and material to the case of the said defendant; and,

That the issuance of a subpoena duces tecum is necessary, the ends of justice requiring it, in order that said records may be available to said defendant at the next term of the Circuit Court of Baldwin County, to-wit, September 15, 1964.

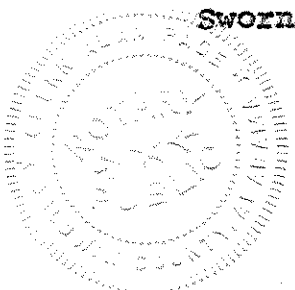
WHEREFORE, your affiant moves this Honorable Court for an order to the Clerk of said court to issue to the said Sara Luther, as bookkeeper of Still Motor Company, Inc., a subpoena duces tecum requiring her to produce in said court on the 15th day of September, 1964, and thereafter as ordered by said Court, the said records herein above described.

Dated this 14 day of September, 1964.


C. Lenoir Thompson

Sworn to and subscribed before me this 14 day of September, 1964.


Notary Public, Baldwin County, Alabama



WALTER D. HICKS

Plaintiff

vs

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 5622

23
CO
4
The ends of justice requiring it, and it appearing to the satisfaction of the court that the following records material or pertinent to the repair of a 1960 Ford Fairlane, 2 Dr. automobile Motor No. OU31V139151, on or about November 13, 1962, or November 17, 1962, and owned by Mary Hicks or Walter D. Hicks are in the possession of Sara Luther, bookkeeper, Still Motor Company, Inc., a corporation, Bay Minette, Alabama, who is not a party to this cause, and that the same are necessary for use as testimony in this cause, it is, therefore,

Ordered that the Clerk do forthwith issue to the said Sara Luther, a subpoena duces tecum requiring her instantly to produce in court the records herein above described.

Dated this the ____ day of September, 1964.

Circuit Judge

WALTER D. HICKS

Plaintiff

vs

ANNIE MAE JETER, formerly
known as ANNIE MAE AARON

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 5622

The ends of justice requiring it, and it appearing to the satisfaction of the court that the following records material or pertinent to the repair of a 1960 Ford Fairlane, 2 Dr. automobile Motor No. OU31VL39151, on or about November 13, 1962, or November 17, 1962, and owned by Mary Hicks or Walter D. Hicks are in the possession of Sara Luther, bookkeeper, Still Motor Company, Inc., a corporation, Bay Minette, Alabama, who is not a party to this cause, and that the same are necessary for use as testimony in this cause, it is, therefore,

Ordered that the Clerk do forthwith issue to the said Sara Luther, a subpoena duces tecum requiring her ~~to~~ to produce in court the records herein above described *on Sept. 15, 1964*

Dated this the 14 day of September, 1964.

D. Moore

Circuit Judge

*Filed 9-14-64
Alice French
clerk*