

Bay Minette, Ala.,

December 23, 63

To the Sheriff of

Choctaw

County,

Butler

Alabama

I enclose herewith

2 S & C to be served on  
R. E. Taylor and Mattie B.  
Taylor Route 1 Box 11 Taylor  
Ala.

Please serve and return as early as possible.

Taylor Wilkins

Sheriff Baldwin County, Alabama

(If not found in your county please advise promptly giving information as to present location if possible)

RETURNED

NOT FOUND IN MY COUNTY AFTER  
DILIGENT SEARCH AND INQUIRY.

THIS THE 27 DAY OF June 1963

LEON CLARK, SHERIFF  
CHOCTAW COUNTY, ALA.

G. W. W. W. D.S.

R. E. Taylor &  
Mattie Taylor Living in  
Baldwin County

JOSEPH F. ELLIOTT	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
vs	)	AT LAW
LAMAR NICHOLSON, R. E.	)	Case No. <u>5873</u>
TAYLOR and MATTIE B.	)	
TAYLOR, Jointly and	)	
Severally,	)	
Defendants	)	

COMPLAINT

Plaintiff claims of the Defendants, jointly and severally, the sum of Nine Hundred and Fifty Dollars (\$950.00) damages for that heretofore and on, to-wit, the 26th day of December, 1962, the Defendant, Lamar Nicholson, while acting as the agent, servant or employee of the Defendants R. E. Taylor and Mattie B. Taylor, and within the line and scope of his authority as such agent, servant or employee of the Defendants R. E. Taylor and Mattie B. Taylor, so negligently operated a motor vehicle on U. S. Highways 90, 98 and 31, a public thoroughfare in Baldwin County, Alabama, at or near the Tensaw River bridge, so as to cause a tire from the said motor vehicle to then and there run into, upon, or against the automobile of the Plaintiff which was then and there being operated on the said U. S. Highways 90, 98 and 31 at or near the Tensaw River bridge, and as a proximate result of the said negligent operation of the said motor vehicle at said time and place, as aforesaid, 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.

**FILED**

DEC 18 1962

ALICE J. DUCK, CLERK  
REGISTER

LYONS, PIPES & COOK  
Attorneys for the Plaintiff

By: [Signature]  
G. Sage Lyons

Defendants' addresses:

Lamar Nicholson  
Bay Minette, Alabama

R. E. Taylor  
Route 1, Box 11  
Toxey, Alabama

Mattie B. Taylor  
Route 1, Box 11  
Toxey, Alabama

JOSEPH F. ELLIOTT	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
vs	)	AT LAW
LAMAR NICHOLSON, R. E.	)	Case No. <u>5873</u>
TAYLOR and MATTIE B.	)	
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Defendants	)	

COMPLAINT

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LYONS, PIPES & COOK  
Attorneys for the Plaintiff

By:   
G. Sage Lyons

FILED

18 1963

CLERK  
REGISTER

Defendants' addresses:

Lamar Nicholson  
Bay Minette, Alabama

R. E. Taylor  
Route 1, Box 11  
Toxey, Alabama

Mattie B. Taylor  
Route 1, Box 11  
Toxey, Alabama

FILED

DEC 18 1963

ALICE L. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5873

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Lamar Nicholson, R. E. Taylor, and Mattie B. Taylor

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

Lamar Nicholson, R. E. Taylor and Mattie B. Taylor, Defendant

by

Joseph F. Elliott, Plaintiff

Witness my hand this 18 day of December 19 63

*Alvin L. Newen*, Clerk

Page -----

THE STATE OF ALABAMA  
BALDWIN COUNTY

# CIRCUIT COURT

Plaintiffs  
vs.

## Defendants

# SUMMONS and COMPLAINT

Filed \_\_\_\_\_, 19\_\_\_\_

**, Clerk**

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

-, 19.....

**Sheriff**

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_\_

by leaving a copy with

**Sheriff**

Deputy Sheriff



## SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 5873

TERM, 19

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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

Lamar Nicholson, R. E. Taylor and Mattie B. Taylor, Defendant

by

Joseph F. Elliott

Plaintiff

Witness my hand this 18 day of December 19 63

Clerk

Ed-12-18-63 on Lamar Nicholson

THE STATE OF ALABAMA  
BALDWIN COUNTY

## CIRCUIT COURT

JOSEPH F. ELLIOTT

vs. Plaintiffs

LAMAR NICHOLSON, R. E. TAYLOR

and MATTIE B. TAYLOR

Defendants

## SUMMONS and COMPLAINT

Filed 12 18, 19 63

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Dec. 18, 1963

Sheriff

I have executed this summons

this 12-18, 1963

by leaving a copy with

Lamar Nicholson

Sheriff claims 4

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff  
BY W. A. Zelbert  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Zelbert Deputy Sheriff

D. Hall

JOSEPH F. ELLIOTT	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
vs	)	AT LAW
LAMAR NICHOLSON, R. E.	)	Case No. <u>5873</u>
TAYLOR and MATTIE B.	)	
TAYLOR, Jointly and	)	
Severally,	)	
Defendants	)	

COMPLAINT

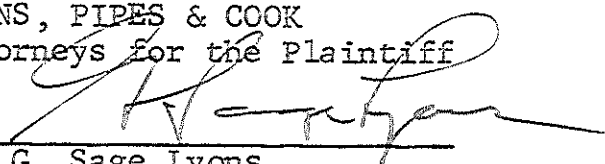
Plaintiff claims of the Defendants, jointly and severally, the sum of Nine Hundred and Fifty Dollars (\$950.00) damages for that heretofore and on, to-wit, the 26th day of December, 1962, the Defendant, Lamar Nicholson, while acting as the agent, servant or employee of the Defendants R. E. Taylor and Mattie B. Taylor, and within the line and scope of his authority as such agent, servant or employee of the Defendants R. E. Taylor and Mattie B. Taylor, so negligently operated a motor vehicle on U. S. Highways 90, 98 and 31, a public thoroughfare in Baldwin County, Alabama, at or near the Tensaw River bridge, so as to cause a tire from the said motor vehicle to then and there run into, upon, or against the automobile of the Plaintiff which was then and there being operated on the said U. S. Highways 90, 98 and 31 at or near the Tensaw River bridge, and as a proximate result of the said negligent operation of the said motor vehicle at said time and place, as aforesaid, 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.

**FILED**

DEC 18 1963

AUGIE J. DUCK, CLERK  
REGISTER

LYONS, PIPES & COOK  
Attorneys for the Plaintiff

By:   
G. Sage Lyons

Defendants' addresses:

Lamar Nicholson  
Bay Minette, Alabama

R. E. Taylor  
Route 1, Box 11  
Toxey, Alabama

Mattie B. Taylor  
Route 1, Box 11  
Toxey, Alabama

FILED

1933

CLERK  
REGISTER

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)  
SAM W. PIPES, III  
WALTER M. COOK  
GORDON B. KAHN  
IRWIN W. COLEMAN, JR.  
G. SAGE LYONS

36601

December 17, 1963

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

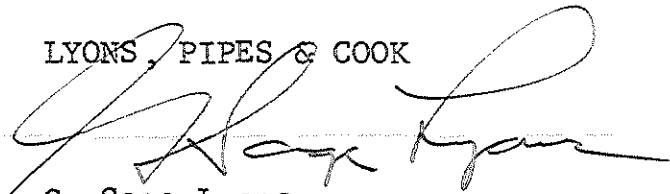
Dear Mrs. Duck:

Enclosed please find the original and three copies of  
a complaint which I ask be filed in the Circuit Court  
of Baldwin County, Alabama, with receipt acknowledged  
to the writer.

Thank you for your assistance. With kindest regards,

Very sincerely,

LYONS, PIPES & COOK



G. Sage Lyons

GSL:hw  
Enclosure

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)

SAM W. PIPES, III

WALTER M. COOK

GORDON B. KAHN

IRWIN W. COLEMAN, JR.

G. SAGE LYONS

36601

January 7, 1964

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

Re: Joseph F. Elliott v. Lamar Nicholson, et al, in the  
Circuit Court of Baldwin County, Alabama, Case  
#5873

Dear Mrs. Duck:

Please forward to us the Cost Bill in the above case  
which case, will in due course, be dismissed without  
further action necessary on the part of your office.

Thank you for your cooperation.

Very truly yours,

LYONS, PIPES & COOK

  
G. Sage Lyons

GSL:hw

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2015

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

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

Defendant

by

Plaintiff

Witness my hand this 10 day of March 19 2015

David J. Ruck, Clerk

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

vs. \_\_\_\_\_  
Plaintiffs

Defendants

**SUMMONS and COMPLAINT**

Filed \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_

by leaving a copy with

Sheriff

Deputy Sheriff