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| To the Sheriff of Chactaw County, Butler, Alah | oama |
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| R. E. Laylor and Mattin B. | |
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| Sheriff Baldwin County, Alal | - |
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THIS THE 27 DAY OF MILE 1965

LEON CLARK, SHERIFF CHOCTAW COUNTY, ALA.

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R. E. Taylor & Mattie Fart Linning in Baldwin Country

| JOSEPH F. ELLIGIY |) | IN THE CIRCUIT COURT OF |
|--|---|-------------------------|
| Plaintiff |) | BALDWIN COUNTY, ALABAMA |
| vs | | AT LAW |
| LAMAR NICHOLSON, R. E. TAYLOR and MATTLE B. |) | Case No. 5873 |
| TAYLOR, Jointly and |) | |
| Severally, |) | |
| Defendants | | |
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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, Lawer 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, servent 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 aferesaid.

TEC 18 1964

AUDE I DICK, CLERK REGISTER

LYONS, PIPPS & COOK

Defendants' addresses:

Lamer Nicholson Bey Minette, Alabama

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

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

| JOSEPH F. ELLIOTT |) IN THE CIRCUIT COURT OF | ₹ |
|--|---------------------------|---|
| Plaintiff |) BALDWIN COUNTY, ALABAMA | À |
| vs |) AT LAW | |
| LAMAR NICHOLSON, R. E. TAYLOR and MATTIE B. TAYLOR, Jointly and Severally, |) Case No. <u>5873</u> | • |
| Defendants | | ٠ |

Plaintiff claims of the Defendants, jointly and severally, the sum of Nime 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.

LYONS, PIPES & COOK

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 1966

MIR L DOG, REGISTER

THE STATE OF ALABAMA,

BALDWIN COUNTY

| | CIRCUIT | COURT, | BALDAIN | COUN. | L |
|-----------------|---------|--------|---------|-------|---|
| No. <u>5873</u> | | | | | |
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TO ANY SHERIFF OF THE STATE OF ALABAMA:

| You Are Hereby | Commanded | to Summon_ | <u> Laman Ni</u> | cholson, R. E. | . Isyior, ar | d Martie B. I | ey Le |
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| • | • | | | • | , | • | |
| Circuit Court of | bear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the t Court of Baldwin County, State of Alabama, at Bay Minette, against | | | | | | |
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| Lamar Nicho | Ison, E. | H. Taylor | and Mack | ic P. Tavlor | | Defendant | |
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| Joseph F. | Elliott | | | · · · · · · · · · · · · · · · · · · · | | Plaintiff Plaintiff | |
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THE STATE OF ALABAMA,

BALDWIN COUNTY

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| No58 | 73 | | | |
| | CIRCUIT | COURT, | BALDWIN | COUNTY |

TO ANY SHERIFF OF THE STATE OF ALABAMA: Lamar Nicholson, R. E. Taylor, and Mattie B. Taylor 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 Lamar Nicholson, R. E. Taylor and Mattie B. Taylor __ Defendant____ оу _ Joseph F. Ellhott Plaintiff December 18 Witness my hand this -

| No. 5873 Page | | Defendant lives at |
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| THE STATE OF ALA | BAMA | RECEIVED IN OFFICE |
| CIRCUIT COUR | T | Dec. 18, 1963 |
| Joseph F. Elliott | | , Sheriff |
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| and MATTIE B. TAYL | or | |
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| Defenda | nt's Attorney | C. C. Le Coeputy Sheriff |
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| JOSEPH F. | ELLIOTT |) | IN THE CIRCUIT COURT OF |
|--------------------------|---------------------------|---|-------------------------|
| | Plaintiff |) | BALDWIN COUNTY, ALABAMA |
| vs | |) | AT LAW |
| LAMAR NICH | OLSON, R. E. MATTIE B. |) | Case No. <u>5873</u> |
| TAYLOR, Jo Severally. | intly and |) | |
| beverarry, | Defendants |) | |
| | Detellants |) | |

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.

DEC 18 1963

LYONS, PIPES & COOK

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

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REGISTER

LYONS, PIPES & COOK

ATTORNEYS AT LAW SI7 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

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

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

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

You Are Hereby Commanded to Summon.

THE STATE OF ALABAMA,

BALDWIN COUNTY

| | ' | CIRCUII | COURT, | PALDWIN | U | OUM. | , |
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TO ANY SHERIFF OF THE STATE OF ALABAMA:

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| Circuit Court of B | aldwin County, Sta | te of Alabama, at Ba | y Minette, against | |
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| | Plaintiff | 's Attorney | | 2. | | | | | | Sheriff |
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| | - cremant S | Auorney | | | | | | | Deputy | Chantee |