

LEWIS CHILDRESS
Plaintiff

-VS-

BETTY J. CATES
Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW:
)
)
)

5980

COUNT ONE:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-THREE and 02/100 DOLLARS (\$163.02) as damages, for that heretofore and on to-wit, the 10th day of July, 1963, Plaintiff was driving his said automobile along and upon Belforest Road at the intersection of Fairhope Avenue, which was then and there a public highway in Baldwin County, Alabama, the Defendant so negligently operated her motor vehicle, as to allow it to collide, run into, or upon or against the automobile of said Plaintiff, and as a direct and proximate result of the negligence of the said Defendant, the Plaintiff's automobile was damaged in that the right front fender was smashed, bent and otherwise damaged, the right front molding was knocked off and lost, the right front wheel was bent, smashed and rendered less valuable, the right front door was bent, smashed, torn and otherwise damaged, and that the Plaintiff's said automobile was otherwise bent, smashed, torn and rendered less valuable, all as a result of the negligence of the Defendant as aforesaid, hence this suit.

Attorney for Plaintiff

Deft. may be served
at 1226 McDonald St.

Brighton, Alabama
Orionton

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW:

LEWIS CHILDRESS
Plaintiff

-VS-

BETTY J. CAPER

Defendant

COUNT ONE:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-THREE and 02/100 DOLLARS (\$163.02) as damages, for that heretofore and on to-wit: the 10th day of July, 1963, Plaintiff was driving his said automobile along and upon Belforest Road at the intersection of Fairhope Avenue, which was then and there a public highway in Baldwin County, Alabama, the Defendant so negligently operated her motor vehicle, as to allow it to collide, run into, or upon or against the automobile of said Plaintiff, and as a direct and proximate result of the negligence of the said Defendant, the Plaintiff's automobile was damaged in that the right front fender was smashed, bent and otherwise damaged, the right front molding was knocked off and lost, the right front wheel was bent, smashed and rendered less valuable, the right front door was bent, smashed, torn and otherwise damaged, and that the Plaintiff's automobile was otherwise bent, smashed, torn and rendered less valuable, all as a result of the negligence of the Defendant as aforesaid, hence this suit.

Attorney for Plaintiff

Def. may be served
at 1226 McDonald St.
Birmingham, Alabama

*Rec'd
Betty J. Caper
1226 McDonald
Birmingham
I found a
man who had a
Dr. McDonald with
Hillman. Not
needed no doctor*

2780

INSTRUCTIONS

SENDER: WRITE (OR TYPE) MESSAGE, PULL OUT YELLOW SHEET, MAIL THE OTHER TWO.
RECIPIENT: WRITE YOUR REPLY AT BOTTOM, MAIL BACK WHITE SHEET AND KEEP THE PINK.

**JOHN V. DUCK
& RICHARD C. LACEY**
Attorneys At Law
319 Magnolia Avenue
FAIRHOPE, ALABAMA

*Message
Reply*

DATE:

November 27, 1964

FILE NO:

PRIORITY

- ☐ URGENT!
☐ SOON AS POSSIBLE
☐ NO REPLY NEEDED

ATTENTION:

SUBJECT:

Case No. 5980
Lewis Childress vs. Betty J. Cates

Mrs. Alice J. Duck
Clerk, Circuit Court
Bay Minette, Alabama

Please dismiss captioned suit and send cost bill

to: Farm Bureau Insurance Company
P. O. Box 6218
Montgomery 6, Ala. (Attention Mr. Ferrell Wood).

Thank you.

SIGNED:

John V. Duck (L.H.)

DATE OF REPLY:

REPLY TO:

SIGNED:

SENDER: MAIL RECIPIENT WHITE AND PINK SHEETS

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

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 5980.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Betty J. Cates

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.....

.....Betty J. Cates....., Defendant.....

byLewis Childress.....

....., Plaintiff.....

Witness my hand this 19th day of March, 1964.

Oliver J. Duck, Clerk

LEWIS CHILDRESS
Plaintiff

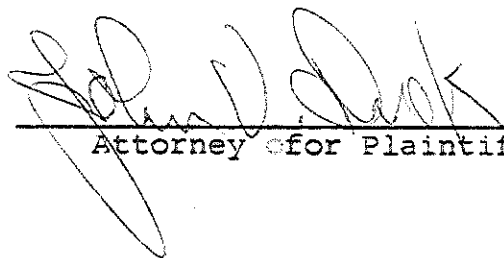
-VS-

BETTY J. CATES
Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
)
) AT LAW:
)
)
)

COUNT ONE:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-THREE and 02/100 DOLLARS (\$163.02) as damages, for that heretofore and on to-wit; the 10th day of July, 1963, Plaintiff was driving his said automobile along and upon Belforest Road at the intersection of Fairhope Avenue, which was then and there a public highway in Baldwin County, Alabama, the Defendant so negligently operated her motor vehicle, as to allow it to collide, run into, or upon or against the automobile of said Plaintiff, and as a direct and proximate result of the negligence of the said Defendant, the Plaintiff's automobile was damaged in that the right front fender was smashed, bent and otherwise damaged, the right front molding was knocked off and lost, the right front wheel was bent, smashed and rendered less valuable, the right front door was bent, smashed, torn and otherwise damaged, and that the Plaintiff's said automobile was otherwise bent, smashed, torn and rendered less valuable, all as a result of the negligence of the Defendant as aforesaid, hence this suit.



Attorney for Plaintiff

Deft. may be served
at 1226 McDonald St.
Brighton, Alabama

FILED

MAR 19 1964

ALICE J. DUCK, CLERK
REGISTER

LEWIS CHILDRESS
Plaintiff

-VS-

BETTY J. CATES
Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW: 5980

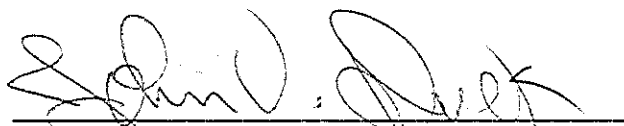
)

)

)

COUNT ONE:

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY-THREE and 02/100 DOLLARS (\$163.02) as damages, for that heretofore and on to-wit; the 10th day of July, 1963, Plaintiff was driving his said automobile along and upon Belforest Road at the intersection of Fairhope Avenue, which was then and there a public highway in Baldwin County, Alabama, the Defendant so negligently operated her motor vehicle, as to allow it to collide, run into, or upon or against the automobile of said Plaintiff, and as a direct and proximate result of the negligence of the said Defendant, the Plaintiff's automobile was damaged in that the right front fender was smashed, bent and otherwise damaged, the right front molding was knocked off and lost, the right front wheel was bent, smashed and rendered less valuable, the right front door was bent, smashed, torn and otherwise damaged, and that the Plaintiff's said automobile was otherwise bent, smashed, torn and rendered less valuable, all as a result of the negligence of the Defendant as aforesaid, hence this suit.


Attorney for Plaintiff

Deft. may be served
at 1226 McDonald St.
~~Brighton~~, Alabama
CRICKTON, ALA.

FILED

MAR 19 1964

ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 5980

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Betty J. Cates

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.....

.....Betty J. Cates....., Defendant.....

byLewis Childress.....

....., Plaintiff.....

Witness my hand this.....19th.....day of.....March.....1964.....

NF
.....Alice J. Lusk....., Clerk

No. 5980

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LEWIS CHILDRESS

BETTY J. CATES

SUMMONS AND COMPLAINT

Filed March 19 1964

Alice J. Duck

Duck & Lacey

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

3/19 1964

Sheriff

I have executed this summons

this 19

by leaving a copy with

RETURNED 11-10-64

Not found in my County after diligent search and inquiry.

RAY D. BRIDGES, Sheriff

By

Melvin Bailey, Sheriff of

Jefferson County, Alabama, claims \$1.50 each for serving

process(es) and \$1.00

travel expense on each of

process(es) or a total of

\$

Deputy Sheriff.

NOT FOUND

in the Bessemer Division of Jefferson

County, Ala., this the day of

MAR 25 1964

MELVIN BAILEY

SHERIFF

BY

D. Sheriff

Deputy Sheriff

Bay Minette, Ala.,

3/19/64

To the Sheriff of

Jefferson

County

Alabama

I enclose herewith

A & C

for

Betty J. Cates

1226

McDonnell St.

Daphne

Ala.

Please serve and return as early as possible.

Wayne E. Jenkins

Sheriff Baldwin County, Alabama

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