

6110

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. F. Halstead, d/b/a Modern Trailer Sales, and Joe Gann 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 Frank E. McGill.

WITNESS my hand this 13 day of July, 1964.

Bennie J. Smith
Clerk

Defendants' address is 3805 Day Street, Montgomery, Alabama.

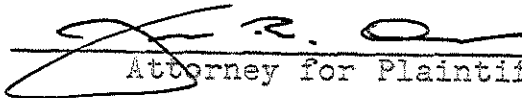
* * * * *

FRANK E. MCGILL,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
C. F. HALSTEAD, d/b/a	)	AT LAW
Modern Trailer Sales, and	)	
JOE GANN,	)	
	)	
Defendants.	)	

C O M P L A I N T
COUNT ONE

The plaintiff claims of the defendants Three Hundred Dollars (\$300.00) for that heretofore on to-wit, June 4, 1964, at 605 Southwest Railroad Street in Bay Minette, Baldwin County, Alabama, Joe Gann, who was at said time and place an agent, servant or employee of the defendant, C. F. Halstead, d/b/a Modern Trailer Sales, acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle so as to cause it to run into, against or over a septic tank of the plaintiff and as a proximate result of the negligence aforesaid the said septic tank was completely destroyed all to the plaintiff's damage, as aforesaid. Plaintiff avers that the said septic tank

was situated on property of the plaintiff at said time. Plaintiff further avers that he is ignorant of the name of the defendant, Joe Gann, and when his true name is discovered, the pleadings and proceedings in this cause will be amended accordingly.


Attorney for Plaintiff

FILED

JUL 18 1964

ALICE I. DICK, CLERK
REGISTER

01/2/10

STATE OF ALABAMA)
*
BALDWIN COUNTY)

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WITNESS my hand this 13 day of June, 1964.

Alvin J. Newk
Clerk

Defendants' address is 3805 Day Street, Montgomery, Alabama.

* * * * *

FRANK E. MCGILL,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
C. F. HALSTEAD, d/b/a	)	AT LAW
Modern Trailer Sales, and	)	
JOE GANN,	)	
	)	
Defendants.	)	

C O M P L A I N T

COUNT ONE

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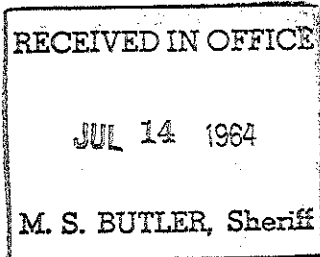

Attorney for Plaintiff

E4-7-14-64 on Halsted
N.F. on Joe Gann

FILED

JUL 13 1964

ALICE J. DICK, CLERK



M. 6110

Frank McGill

VS.

EXECUTED BY SERVING A
COPY OF THE WITHIN on
C. F. Halstead d/b/a
Modern Trailer Sales

C. F. Halstead, d/b/a
Modern Trailer Sales
and Joe Gann

as for Joe Gann
not found.

This the 14 day of July 1964
M. S. BUTLER
Sheriff Montgomery County
By W. L. Ransom
Deputy Sheriff

(There is a W. L. Ransom
working)

FILED

ALICE I. DICK, CLERK
REGISTER

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA 36507

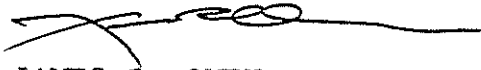
August 26, 1964

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

Dear Mrs. Duck:

Please dismiss the case of Frank McGill,
plaintiff, vs. C. F. Halstead, et al, defendants,
which is pending in the Circuit Court of Baldwin
County, Alabama, at Law, and is case number 6110.

Yours very truly,



JAMES R. OWEN

JRO/ers