

Bay Minette, Ala.
November 4, 1964

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Ala.

General Finance Corporation

vs

John William Jones, et al.

Civil No. 6479

Dear Mrs. Duck:

I am this day filing an appearance as an associate of the firm of Postersfield and Schell, Birmingham, as Attorney of Record for the plaintiff in said cause.

Yours very truly
Rexley F. McFadyen
Attorney - Bay Minette, Ala.

FILED

NOV 4 1964

ALICE J. DUCK, CLERK
REGISTER

GENERAL FINANCE CORPORATION,)	IN THE CIRCUIT COURT OF
)	JEFFERSON COUNTY, ALABAMA
Plaintiff)	
VS)	AT LAW
)	
JOHN WILLIAMS JONES AND)	
MRS. GIBSON JONES,)	
)	
Defendants)	CASE NO. 82973

DEMURRER

Come the Defendants, John Williams Jones and Mrs. Gibson L. Jones, separately and severally, and demur to the complaint heretofore filed in the above-styled cause by the Plaintiff, and assign the separate and several grounds therefor:

1. For that the allegations contained therein fail to state a cause of action against the Defendants.
2. For that the allegations contained therein fail to state a cause of action against the Defendant John Williams Jones.
3. For that the allegations contained therein fail to state a cause of action against the Defendant Mrs. Gibson L. Jones.
4. For that the allegations contained therein fail to show that there was any consideration received by the Defendants.
5. For that the allegations contained therein fail to show that there was any consideration received by the Defendant John Williams Jones.
6. For that the allegations contained therein fail to show that there was any consideration received by the Defendant Mrs. Gibson L. Jones.
7. For that the allegations contained therein fail to show any breach, by the Defendants, of the alleged contract referred to in the complaint.
8. For that the allegations contained in the complaint fail to show that the Plaintiff complied with all the agreements of the alleged conditional sales contract on his part.

9. For that the allegations contained therein fail to apprise the Defendants of the subject matter of the alleged conditional sales contract referred to in the Plaintiff's complaint.

10. For that the allegations contained therein are mere conclusions of the pleader.

11. For that the allegations contained therein contain conclusions of law and fail to aver facts substantiating any contract between the Plaintiff and the Defendants or either of the Defendants.

Fred M. Johnson Jr.

FILED
OCT 3 1964
AMEL L. DICK, CLERK
REGISTER

GENERAL FINANCE CORPORA-
TION,

Plaintiff,

Vs.

JOHN WILLIAM JONES and
MRS. GIBSON L. JONES,

Defendants.

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6179

DEMURRER

Comes now the Defendants in the above styled cause and files the following demurs to the Plaintiff's Complaint:

1.

Plaintiff fails to state a cause of action.

2.

Complaint is vague, indefinite and uncertain.

3.

From this Complaint, the Defendants are unable to determine the owner of the conditional sales contract sued on.

4.

Complaint fails to state whether the contract sued on is oral or in writing.

5.

Complaint fails to show wherein the Defendants have breached the contract sued on.

WILTERS & BRANTLEY

BY: 

Attorneys for Defendants

FILED

JAN 5 1965

ALICE L. DUCK, CLERK
REGISTER

Amended Complaint

General Finance Corporation
Plaintiff

Vs

John William Jones and
Mrs. Gibson L. Jones
Defendants

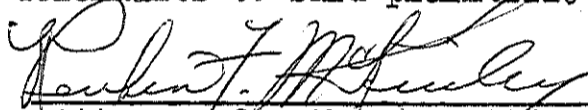
In the Circuit Court of
Baldwin County, Alabama
At Law. No. 6179

1.

The Plaintiff's claims of the Defendants Eight Hundred forty nine and 17/100 dollars due by Conditional sales contract made by them and payable to Russell Vaughn Ford, Inc. Birmingham, Alabama, for which the Plaintiff was a purchaser for value, said contract being of date 29th July, 1963 and being for the purchase of a 1963 Ford Galaxie hardtop automobile and signed by the above named defendants. The above amount on said contract is still due and unpaid by the defendants to said plaintiff. The defendants by said contract waived all exemptions to which they were entitled.

2.

The plaintiff claims of the defendants one hundred fifty seven and 38/100 dollars as a reasonable Attorney's fee, which the defendants herein contracted to pay in a conditional sales contract made by them with Russell Vaughn Ford, Inc. Birmingham, Alabama, of date July 29, 1963, if suit was necessary for collection of any amount of the purchase price of said car, stipulated in said contract. Plaintiff alleges that suit has been necessary and that said amount is still due and unpaid by the defendants to said plaintiff.


Attorney for the Plaintiff

FILED
DEC 30
Baldwin County, Alabama
Register

GENERAL FINANCE CORPORATION,) IN THE JEFFERSON COUNTY
 Plaintiff) CIVIL COURT,
) JEFFERSON COUNTY, ALABAMA

VS) AT LAW

JOHN WILLIAMS JONES and)
 MRS. GIBSON JONES,)
 Defendants) CASE NO. 82973

FILED
 SEP 8 1964
 ALICE L. DUCK, CLERK

PLEA IN ABATEMENT

Come now the defendants, John Williams Jones and Mrs. Gibson L. Jones, jointly and separately, and file this plea in abatement, appearing herein especially for the sole purpose of filing this plea in abatement and for no other reason, and without submitting to the jurisdiction of this Honorable Court, says as their plea in abatement the following, to-wit:

The defendants reside at 617 North Mobile Avenue, Fairhope, Alabama, in Baldwin County, Alabama and have permanently resided in Fairhope, Baldwin County, Alabama since 1955 and said defendants have never established a permanent residence within Jefferson County, Alabama, since 1955.

WHEREFORE the defendants, jointly and separately, move this Honorable Court to sustain this their plea in abatement and to transfer this case to the Circuit Court of Baldwin County, Alabama.

John Williams Jones

 JOHN WILLIAMS JONES

Mrs. Gibson L. Jones

 MRS. GIBSON L. JONES

STATE OF ALABAMA
 COUNTY OF MOBILE

Before me, Fred W. Killion, Jr., a Notary Public in and for said State of Alabama, personally appeared John Williams Jones and Mrs. Gibson L. Jones, who being first duly sworn, depose and say that they are the defendants in the above styled action, that they have read the foregoing plea in abatement, and that the facts

THE STATE OF ALABAMA,
JEFFERSON COUNTY.

To Any Lawful Officer of said State—Greeting:

Summon JOHN WILLIAMS JONES AND MRS. GIBSON L. JONES to

appear before Jefferson County Civil Court on the 30TH day of JUNE, 19 64.

at 9:00 A.M., next at Room No. 518, Courthouse in Birmingham, to answer the Complaint of _____

GENERAL FINANCE CORPORATION

and there make return of this writ.

Witness my hand, this 4 day of JUNE, 1964.

Jeanette Blackburn
CLERK

_____, Clerk.

17/100 (\$849.17)

Plaintiff claims of the Defendant the sum of EIGHT HUNDRED FORTY-NINE AND Dollars

CONDITIONAL SALES CONTRACT

due by _____ made by Defendant on to-wit: 29TH day of JUNE, 19 63

and payable with interest, and Plaintiff avers that as part of said instrument Defendant waived his right to exemption as to personal property and agrees to pay a reasonable attorney's fee which he also claims, to-wit:

\$ 157.38

396

Porterfield & Scholl Plaintiff's Attorney.
PORTERFIELD & SCHOLL, 1609 - 2121 BUILDING

82973

No. _____

**THE STATE OF ALABAMA,
JEFFERSON COUNTY**

JEFFERSON COUNTY CIVIL COURT
Room No. 518
Courthouse

SUMMONS & COMPLAINT

GENERAL FINANCE CORPORATION
609 SOUTH 20TH STREET
BERMINGHAM, ALABAMA

vs. Plaintiff.

JOHN WILLIAMS JONES AND
MRS. GIBSON JONES
617 NORTH MOBILE AVENUE
FAIRHOPE, ALABAMA Defendant.

Garnishee.

ABOVE ADDRESS
Defendant at

Garnishee at

The Defendant is hereby notified that
Writ of Garnishment has been issued to

Issued _____

19 _____

Clerk _____

FILED
JUN 4 - 1964
JEFF. CO. CIVIL COURT

Rec'd 6/8/64

The within process executed by personal
service of a copy of said Summons and Com-
plaint and notice on the Defendant.

This 12th day of June, 1964

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Baldwin
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Fred Seibert
F hope

Deputy Sheriff.

N

Baldwin

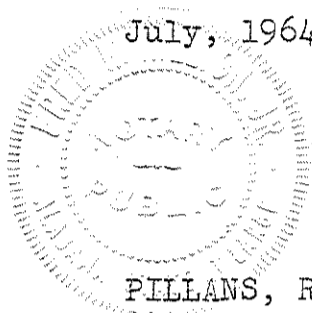
stated in said plea in abatement are true.

John William Jones

Mrs Gibson L. Jones

Subscribed and sworn to before me this 15 day of

July, 1964.



F. M. Pillans
Notary Public, State at Large

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS
Attorneys for Defendants

GENERAL FINANCE CORPORATION,)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
Plaintiff)	
VS)	AT LAW
)	
JOHN WILLIAMS JONES and)	
MRS. GIBSON JONES,)	
)	CASE NO. 6179
Defendants)	

PLEAS

Comes the defendants, separately and severally, and for answer to the complaint heretofore filed in said cause by the plaintiff, files the following separate and several Pleas thereto:

PLEA ONE

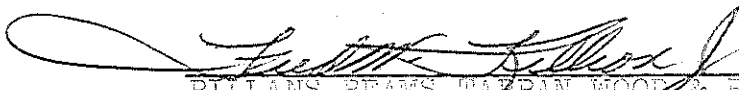
The defendants, separately and severally, respectfully aver that they are not guilty of the allegations contained therein.

PLEA TWO

The defendants, separately and severally, respectfully aver that the allegations contained in the complaint are untrue.

PLEA THREE

The defendants, separately and severally, for answer to said complaint, saith that they have paid the debt for the recovery of which this suit was brought, before the action was commenced.


PILLANS, REAMS, TAPPAN, WOOD & ROBERTS
Attorneys for Defendants
By: Fred W. Killion, Jr.

FILED
SEP 14 1965
ALICE J. DICK, CLERK
REGISTER

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

LAWYERS AND PROCTORS

VAN ANTWERP BUILDING

P O BOX 935

MOBILE 1, ALABAMA

PALMER PILLANS
W. DEWITT REAMS
JOHN H. TAPPAN
GEORGE F. WOOD
BONNERRAE H. ROBERTS
RICHARD W. VOLLMER, JR.
ABRAM L. PHILIPS, JR.
FRED W. KILLION, JR.
RONALD M. CHILDREE

August 10, 1964

CABLE ADDRESS: PTAH
TELEPHONE 432-3644

Clerk, Circuit Court of Baldwin County
Bay Minette, Alabama

Re: General Finance Corporation
vs.
John Williams Jones and
Mrs. Gibson Jones

Dear Mrs. Duck:

We represent the defendants in the above styled cause which was originally filed in the Circuit Court of Jefferson County, Alabama, at law, bearing their case number 82973. We filed a plea in abatement in the Circuit Court of Jefferson County which was sustained and the case is to be transferred to the Circuit Court of Baldwin County, Alabama.

We wish to demand a jury trial in this proceeding and would appreciate your advising us when the file is received in your offices in order that we might file appropriate pleadings thereto.

We wish to thank you for your cooperation and look forward to hearing from you.

Very truly yours,

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

BY: Fred W. Killion, Jr.
ct

FWKjr/ct

JEFFERSON COUNTY CIVIL COURT

516 COURT HOUSE

PHONE 323-5311

EXTS. 278-279

DAVID HAIGLER, PRESIDING JUDGE
WM. C. BARBER, ASSOCIATE JUDGE

JEANETTE BLACKBURN, CLERK

BIRMINGHAM, ALABAMA

September 4, 1964.

Clerk, Circuit Court,
Baldwin County,
Bay Minette, Alabama.

Dear Sir:

In Re: Case No. 82973


General Finance Corporation,

vs.

John Williams Jones and Mrs. Gibson
L. Jones.

Enclosed you will find the Court file and a transfer of all the minutes, orders, and other proceedings in the above styled case, which is transferred by order of this Court, pursuant to Title 7, Sec. 64, p.1, 1940 Code of Alabama, as amended (Act No. 76 in Special Session of 1961 Legislature, approved September 15, 1961).

Yours truly,


Clerk

Enc.

Clerk, Jefferson County
Civil Court

Copies to:

Porterfield & Scholl, Attorneys,
2121 Building, City,

-and-

Fred W. Killian, Jr.,
P. O. Box 935,
Mobile, Alabama.

**TRANSCRIPT OF DOCKET
JEFFERSON COUNTY CIVIL COURT**

Case No. 82973

NAME OF PARTIES	CAUSE OF ACTION	ITEMIZED BILL OF COST						
General Finance Corporation, (609 South 20th Street) VS. John Williams Jones and Mrs. Gibson L. Jones (617 North Mobile Avenue, Fairhope)	\$849.17 Conditional sales contract 157.38 Attorney's fee	<p align="center">COURT FEES</p> Issuing Summons and Complaint.....\$1.00 Issuing.....Alias Summons......50 Issuing.....Subpoena, each witness......15 Issuing.....Exec. and taxing cost......50 Issuing.....Summons to Garnishee......75 Issuing.....Summons to Garnishee......50 Issuing Attachment Writ..... <u>Reg. Mail</u>50 Attachment Bond and Affidavit.....1.50 Garnishment Bond and Affidavit......75 Garnishment Bond and Affidavit......50 Writ of Detinue......50 Detinue Bond and Affidavit......75Garnishment on Judgment......50Library Tax......10Cer. not otherwise provided for......25 Docketing Cause over \$3,000.....9.10 Docketing Cause.....6.10 Issuing.....Vendi, Exponas......50 Transcript of Proceeding......50 Attending Trial of Right of Property.....1.00Sci. Fa. or Notice in nature thereof......50Notice to Defendant......251.25 <p align="center">CONSTABLE'S FEES CIVIL CASES</p> Serving.....Summons..... <u>70 Mi.</u>2.50 Entering Return..... <u>70 "</u>25 Serving.....Summons, each witness......65 Serving.....Garnishment.....2.50 Serving.....Garnishment.....2.50 Levying Attachment.....1.50 Serving Gar. on Judgment.....2.50 Levying Execution.....1.50 Making Money, 5%, not less than 75¢ Serving.....Notice, etc., on each party therein......65 Serving.....Notice, etc., on each party therein.....2.50 Serving Sci. Fa. or other like notice.....2.50 Taking Bond.....2.00 Taking Property Levied on.....6.00 Gar. Ans. Fee..... <u>Total Clerk 12.70</u> <u>Total Sher 12.00</u> <u>24.70</u> Witness Fees..... Miscellaneous.....						
	<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:15%;">Date</th> <th style="width:35%;">Received of</th> <th style="width:15%;">Amount</th> <th style="width:35%;">Judgment</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		Date	Received of	Amount	Judgment		
Date	Received of	Amount	Judgment					

DISPOSITION OF CASE

Affidavit and Bond filed for

Writ and Summons and Complaint issued Ret. 6-30-64

(2) " & " Ret. Executed by Taylor Wilkins, Sheriff.
 Seibert, Deputy Sheriff.
 Baldwin County, Ala.

On motion of Parties case continued to 8-25-64 for Trial.

Plea in Abatement filed.

Defendant's plea in abatement granted and this cause is hereby transferred to Circuit Court, Baldwin County, Bay Minette, Alabama, and the costs of this proceeding in this Court are hereby taxed to Plaintiff.

David Haigler, Judge.

I, Jeanette Blackburn, in my capacity as Clerk of the Jefferson County Civil Court, hereby certify that the above is a true and correct exemplification of all the minutes, orders and all proceedings in the above styled case in this Court.

Witness my hand, this 4th day of September, 1964.

Jeanette Blackburn, Clerk.

RECEIPTS

Paid Court Fees

Paid Constable

AURA G. DOUGLAS,
Plaintiff,

VS.

GEORGIE L. RAMSEY,
Defendant.

: IN THE CIRCUIT COURT
OF BALDWIN COUNTY,
:
ALABAMA
:
AT LAW
:
NO. 6188

COUNT ONE

Plaintiff sue to recover possession of the following tract of land:

From the point of intersection of the South line of lot 2 Louis D'Oliver Claim Township 5, South Range 2 East, Baldwin County, Alabama, and the west line of Highway 98; thence run westwardly of the south line of said lot a distance of 181 feet to the point of beginning of the lands herein described; thence which runs along the south side a graded road; run thence along said old fence line to a point at a old fence corner which is distant westward 1461.5 feet from the west right-of-way line of U. S. Highway No. 98 at which point said fence corner is 39 feet north of the south line of Lot 2; continuing thence westwardly along a more recent constructed fence line running to a point that is 1704.4 feet west of the west right-of-way line of U. S. Highway No. 98; thence in a northwardly direction 37 feet to a point that is 1742 feet west of above mentioned west right-of-way line; thence run north 85 degrees 50 minutes west 600 feet more or less to the east margin of Mobile Bay; thence southwardly along said east margin 107 feet more or less to a point where it is intersected by the south line of Block 2 of the D'Oliver Claim; thence east along the south line of said Lot 2, 2,070 feet more or less to the place of beginning.

of which they were in possession and upon which pending such possession and before the institution of this suit the defendant entered and unlawfully withheld together with \$20,000.00 for the detention thereof.

DEFENDANT'S ADDRESS

Paradise Beach
Daphne, Alabama

Attached hereto is a plat of survey of the above described property and is made a part of plaintiff's bill of complaint and is marked as plaintiff's Exhibit "A".

Clarence E. Moses
Attorney for Plaintiff
1050 1/2 Davis Avenue
Mobile, Alabama

Clarence E. Moses
Clarence E. Moses
Attorney for Plaintiff

FILED

SEP 8 1934

ALICE J. DUCK, CLERK REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA
BALDWIN COUNTY

No. 6180

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Georgie L. Ramsey

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.....

..... Georgie L. Ramsey, Defendant.....

by Aura G. Douglas,

..... Plaintiff.....

Witness my hand this 8th day of September 19 64

Ex-9-12-64

Alice D. Luck Clerk

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

AURA G. DOUGLAS

Plaintiffs

vs.

GEORGIE L. RAMSEY

Defendants

SUMMONS AND COMPLAINT

FiledSept...8,..... 19.64..

.....Alice J. Duck..... Clerk

CLARANCE E. MOSES

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

9/8 19.64
Taylor Wilkins, Sheriff

I have executed this summons

this 12th of Sept. 19.64
by leaving a copy with

Georgia Ramsey

Sheriff claims 5 1/2 miles at

Ten Cents per mile Total \$ 5.25

TAYLOR WILKINS, Sheriff

BY *[Signature]*
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

J. M. Eastland, Deputy Sheriff
Daphne, Ala

September 24, 1964

ROBERT PREVITO, Plaintiff
VS
AUDREY A. WILLIAMS, JR., Defendant

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA CIVIL
DIVISION

CASE NO. 6181

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA CIVIL DIVISION:

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on September 11, 1964
I sent by certified mail in an envelope addressed as follows:

"Audrey A. Williams, Jr.
2626 Arroyo Rd.
Waco, Texas"

"Certified Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of
the State of Alabama in words and figures as follows:

" Audrey A. Williams, Jr.
2626 Arroyo Rd.
Waco, Texas

You will take notice that on September 11, 1964 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: ROBERT PREVITO, Plaintiff VS AUDREY A. WILLIAMS, JR., Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA CIVIL DIVISION
Case No. 6181 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and
effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 11
day of September 1964

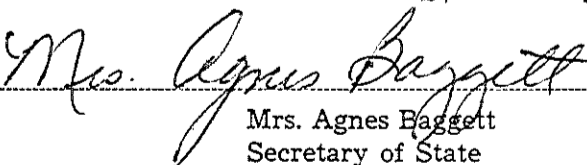
(Signed) Mrs. Agnes Baggett
Secretary of State"

Enclosure (1)

I further certify that the notice above set out which was so mailed in the envelope addressed
as above set forth had attached to it a true copy of the summons and complaint in the above-styled
cause.

I further certify that on Sep 23 1964 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at address not given
on Sep 21 1964

WITNESS MY HAND and the Great Seal of the State of Alabama this the 24 day
of September 1964


Mrs. Agnes Baggett
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Hon. Ma A. Marsal
1st National Bank Bldg.
Mobile, Ala.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. -----
8181

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon _____

Audrey A. Williams, Jr

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...
Audrey A. Williams, Jr

by _____

Robert Previto

-----, Plaintiff...

Witness my hand this _____ day of _____ 1964

9
9

Sept
September

Clerk

ROBERT PREVITO	I	IN THE CIRCUIT COURT
Plaintiff	I	OF BALDWIN COUNTY
VS	I	ALABAMA
AUDREY A. WILLIAMS, JR.	I	CIVIL DIVISION
Defendant	I	NO. _____

The Plaintiff claims of the Defendant the sum of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00) as damages for that heretofore and on, to-wit August 28, 1964 the Defendant did negligently operate an automotive vehicle on and along U. S. Highway 90 at Loxley, Alabama, said Highway 90 being a public highway in Baldwin County, Alabama as to run upon, over and against the Plaintiff's automobile that he was operating on U. S. Highway 90 at the time and place aforesaid and as a direct and proximate result of the Defendant's negligence the Plaintiff has sustained severe and permanent injuries to his right leg, chest and he has suffered multiple abrasions and bruises about his face and body and has been made sick and sore and suffered physical pain and mental anguish and the Plaintiff was gainfully employed at the time of the accident and has lost time from his employment and the Plaintiff has incurred expense in and about the treatment of his injuries, all for which the Plaintiff sues. The Plaintiff alleges that the Defendant is a non-resident of the State of Alabama and is a resident of the State of Texas.

M. A. Marsal
 M. A. MARSAL
 Attorney for Plaintiff

The Plaintiff demands a trial by a jury.

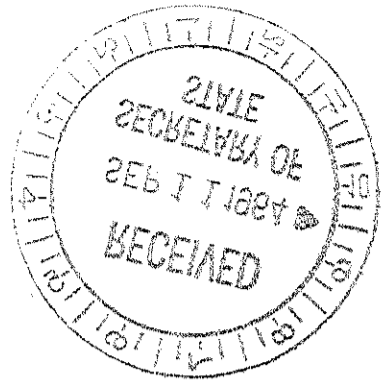
M. A. Marsal
 M. A. MARSAL
 Attorney for Plaintiff

FILED

SEP 9 1964

ALICE I. DUCK, CLERK REGISTER

Defendant may be served:
Serve through Secretary of State
2626 Arroyo Road
Waco, Texas



181

181

ROBERT PREVITO	I	IN THE CIRCUIT COURT
Plaintiff	I	OF BALDWIN COUNTY
VS	I	ALABAMA
AUDREY A. WILLIAMS, JR.	I	CIVIL DIVISION
Defendant	I	NO. <u>6151</u>

The Plaintiff claims of the Defendant the sum of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00) as damages for that heretofore and on, to-wit August 28, 1964 the Defendant did negligently operate an automotive vehicle on and along U. S. Highway 90 at Loxley, Alabama, said Highway 90 being a public highway in Baldwin County, Alabama as to run upon, over and against the Plaintiff's automobile that he was operating on U. S. Highway 90 at the time and place aforesaid and as a direct and proximate result of the Defendant's negligence the Plaintiff has sustained severe and permanent injuries to his right leg, chest and he has suffered multiple abrasions and bruises about his face and body and has been made sick and sore and suffered physical pain and mental anguish and the Plaintiff was gainfully employed at the time of the accident and has lost time from his employment and the Plaintiff has incurred expense in and about the treatment of his injuries, all for which the Plaintiff sues. The Plaintiff alleges that the Defendant is a non-resident of the State of Alabama and is a resident of the State of Texas.

M. A. Marsal

M. A. MARSAL
Attorney for Plaintiff

The Plaintiff demands a trial by a jury.

FILED

SEP. 9 1964

ALICE J. DICK, CLERK REGISTER

M. A. Marsal

M. A. MARSAL
Attorney for Plaintiff

Defendant may be served:
Serve through Secretary of State
2626 Arroyo Road
Waco, Texas

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 6181

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Audrey A. Williams, Jr

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

Audrey A. Williams, Jr -----, Defendant

by Robert Previto -----

-----, Plaintiff

Witness my hand this 9 day of September 1964.

64-9-11-64 on Sec. of State Alice J. Neuch -----, Clerk

No. 6181 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

ROBERT PREVITO

Plaintiffs

vs.

AUDREY A. WILLIAMS, Jr

Defendants

Summons and Complaint

Filed 9-9- 19 64

Alice J. Duck

Clerk

M. A. Marsal

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE
Received In Office
SEP 11 1964
9/9
M. S. BUTLER, Sheriff

(3)

19 64

Sheriff

I have executed this summons

this _____ 19 _____

by leaving a copy with

Executed by serving 3 copies of

the within on Copied Baggett
Secretary of State of The State of
Alabama.

This the 11 day of Sept 19 64

Sheriff of Montgomery County

M. S. Butler,

By J. H. ... D. S.

The Sheriff claims 2
miles at 10c per mile for a total
of \$ 20
M. S. Butler, Sheriff
Montgomery County, Ala. Sheriff

Deputy Sheriff