

November 6, 1964

FREDA ANN AMOS, Plaintiff  
 VS  
 RUSSELL EARL TAYLOR, Defendant

IN THE CIRCUIT COURT OF BALDWIN  
 COUNTY, ALABAMA

CASE NO. 6277

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA at Law:

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on November 2, 1964  
 I sent by certified mail in an envelope addressed as follows:

"Russell Earl Taylor  
 P.O.Box 71  
 Gulf Breeze, Fla."

"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:

" Russell Earl Taylor  
 P.O.Box 71  
 Gulf Breeze, Fla.

You will take notice that on November 2, 1964 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: FREDA ANN AMOS, Plaintiff VS RUSSELL EARL TAYLOR, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW  
 Case No. 6277 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 2  
 day of November 1964

Enclosure (1)

(Signed) Mrs. Agnes Baggett  
 Secretary of State"

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 Nov 4 1964 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Gulf Breeze Fla.  
 on 11-3-64

WITNESS MY HAND and the Great Seal of the State of Alabama this the 6 day  
 of November 1964

*Mrs. Agnes Baggett*  
 Mrs. Agnes Baggett  
 Secretary of State

Enclosures: Return Receipt Card and copy  
 of Summons and Complaint.  
 cc: Hon.C. LeNoir Thompson  
 Thompson & White  
 Bay Minette, Ala.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6277

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon RUSSELL EARL 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.....

RUSSELL EARL TAYLOR

....., Defendant.....

by FREDA ANN AMOS

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

Witness my hand this.....

28

day of.....

Oct 1964

Alice J. Duck

Clerk

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

FREDA ANN AMOS

## Plaintiffs

vs.

RUSSELL EARL TAYLOR

## Defendants

## SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

P. O. Box 71

Gulf Breeze, Florida

Received In Office

19.....

Sheriff

I have executed this summons

19.....

by leaving a copy with

Sheriff

Deputy Sheriff

FREDA ANN AMOS

Plaintiff

VS

RUSSELL EARL TAYLOR

Defendant

X

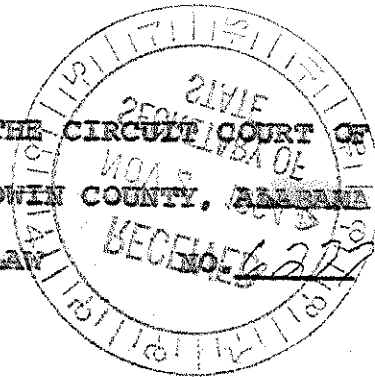
X

X

X

X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW



COUNT ONE:

The plaintiff claims of the defendant the sum of Five Hundred (\$500.00) Dollars as damages, for that heretofore on to-wit: May 15, 1964, at about 3:00 P.M. said plaintiff was operating an automobile on a public highway in Baldwin County, on Alabama 59 at the intersection of said road with County Road No. 47, where she had a right to be and the defendant, Russell Earl Taylor, so negligently operated his motor vehicle which he was operating so as to run over, upon or against the automobile which the plaintiff was then and there operating and plaintiff avers that as a proximate consequence thereof, her said automobile was damaged about the front end, to-wit: front fenders, head lights, radiator, and tires together with the front end assembly and frame, all of which damages were proximately caused by the said negligence of the said defendant in the negligent operation of said motor vehicle at the time and place and on the occasion as aforesaid.

THOMPSON & WHITE

BY:

*[Signature]*  
Attorneys for plaintiff

FILED

OCT 28 1964

ALICE I. DICK, CLERK  
REGISTER

FREDA ANN AMOS

Plaintiff

vs

RUSSELL EARL TAYLOR

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6247

Comes the plaintiff in the above styled cause and propounds the following interrogatories to the defendant, Russell Earl Taylor:

1. State your correct name.

2. State your correct address.

3. Were you driving a motor vehicle, to-wit: a 1958 Chevrolet Sedan, Registration No. 64-33-2830 Florida on to-wit, May 15, 1964, in Baldwin County, Alabama?

4. While operating this motor vehicle, did you drive on Baldwin County road 47 West across Alabama Road 59 and collide with a motor vehicle operated by the plaintiff herein?

5. If your answer is "yes", did you make a report of the accident to any officer of the State of Alabama following the accident?

THOMPSON & WHITE

BY: C. LeNoir Thompson  
Attorneys for plaintiff

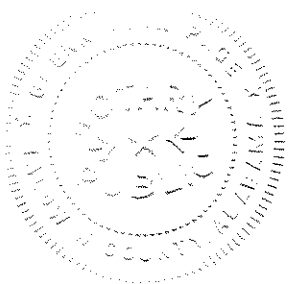
STATE OF ALABAMA  
BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows: My name is C. LeNoir Thompson and I am one of the Attorneys of Record for the plaintiff in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the defendant to the foregoing interrogatories will, if truthfully made, be material evidence for the plaintiff on the trial of said cause.

C. LeNoir Thompson  
C. LENOIR THOMPSON

Subscribed and sworn to before me by the said C. LeNoir Thompson on this 12 day of December, 1964.

[Signature]  
Notary Public



FILED

DEC 15 1964

MADE A. DICK  
CLERK  
REGISTER

I hereby accept result of the within  
interrogation This 22nd day of Dec,  
1961.

Wilbur Haynes

ADJ for Def.

I hereby accept result of the within  
interrogation. This 22nd day of Dec,  
1961.

W. L. Hay  
ATD for Def.

FREDA ANN AMOS

PLAINTIFF

VS

RUSSELL EARL TAYLOR

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 6277

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Comes now the Defendant in the above styled cause and for answer to the Plaintiff's complaint says:

1. The matters alleged therein are untrue.
2. Not guilty.

3. The Defendant sayth that the damaged alleged in the complaint was the proximate result of the Plaintiff's own negligence viz: Plaintiff did at the time and place allege in the complaint operate her motor vehicle in a negligent manner by driving the same at an excessive rate of speed, which said negligence was the proximate cause of the damage done to Plaintiff.

Walter Hays  
Attorney for Defendant

Defendant demands a trial by jury.

This the 24th day of November, 1964.

Walter Hays  
Attorney for Defendant

Filed 11-24-64  
Cliff J. Duck  
Clerk



NUMBER: 6277

FREDA ANN AMOS

PLAINTIFF

VS

RUSSELL EARL TAYLOR

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

FREDA ANN AMOS

Plaintiff

vs

RUSSELL EARL TAYLOR

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

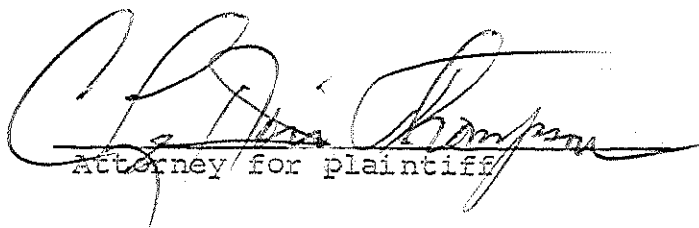
BALDWIN COUNTY, ALABAMA

AT LAW NO. 6277

~~TO THE HONORABLE TELFAIR J. MASHBURN, JUDGE OF THE CIRCUIT COURT~~  
OF BALDWIN COUNTY, ALABAMA:

Comes the plaintiff, Freda Ann Amos, and shows unto the Court that more than thirty days prior to the filing of this motion, the plaintiff in the above styled cause propounded interrogatories to defendant, Russell Earl Taylor, under Code 1940, Tit. 7, Section 477-486, requiring said defendant to answer certain interrogatories therein propounded, and that although more than sixty days have elapsed since the service by the sheriff of said interrogatories upon the defendant, Russell Earl Taylor, the said defendant has failed, and still fails and refuses to answer the interrogatories therein propounded.

Wherefore, the plaintiff moves the Court to enforce the penalty as provided by Title 7, Section 483 of the Code of 1940, as recompiled.

  
Attorney for plaintiff

FILED

APR 27 1965

ALICE L. DUCK, CLERK  
REGISTER

FREDA ANN AMOS

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

RUSSELL EARL TAYLOR

X

AT LAW

NO. 6277

Defendant

X

COUNT ONE:

The plaintiff claims of the defendant the sum of Five Hundred (\$500.00) Dollars as damages, for that heretofore on to-wit: May 15, 1964, at about 3:00 P.M. said plaintiff was operating an automobile on a public highway in Baldwin County, on Alabama 59 at the intersection of said road with County Road No. 47, where she had a right to be and the defendant, Russell Earl Taylor, so negligently operated his motor vehicle which he was operating so as to run over, upon or against the automobile which the plaintiff was then and there operating and plaintiff avers that as a proximate consequence thereof, her said automobile was damaged about the front end, to-wit: front fenders, head lights, radiator, and tires together with the front end assembly and frame, all of which damages were proximately caused by the said negligence of the said defendant in the negligent operation of said motor vehicle at the time and place and on the occasion as aforesaid.

FILED

OCT 28 1964

ALICE J. DUCK, CLERK  
REGISTER

THOMPSON & WHITE

BY:

  
Attorneys for plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6277

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

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You Are Hereby Commanded to Summon RUSSELL EARL 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.....

RUSSELL EARL TAYLOR..... Defendant.....

by FREDA ANN AMOS.....

..... Plaintiff.....

Witness my hand this 28 day of Sept 1964

Eliza J. Duck Clerk

Ex-11-2-64 on Sec. of State  
Ex- by Sec. of State on Recd by Reg-Mail 11-4-64

No. 6277 Page.....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

FREDA ANN AMOS

Plaintiffs

vs.

RUSSELL EARL TAYLOR

Defendants

SUMMONS AND COMPLAINT

Filed Oct 28 1964

Alice J. Luck Clerk

Plaintiff's Attorney

Defendant's Attorney

2339  
Defendant lives at -  
P. O. Box 71  
Gulf Breeze, Florida

RECEIVED In Office  
NOV 2 1964

(3) 10/29/64 Sheriff  
M. S. BUTLER, Sheriff  
I have executed this summons

this ..... 19.....  
by leaving a copy with

Executed by serving 3 copies of  
the within on Agnis Baggett  
Secretary of State of The State of  
Alabama.

This the 2 day of Nov 1964

Sheriff of Montgomery County,

M. S. Butler,

By J. Romeo D.S.

The Sheriff claims 2  
miles at 10c per mile for a total  
of \$ 20

M. S. Butler, Sheriff  
Montgomery County, Ala.

Deputy Sheriff