

GARY RANDALL MERCHANT,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
JAMES H. OGWYNNS and GULF)	
COAST TRUCK AND EQUIPMENT)	
COMPANY, Incorporated, a)	
corporation,)	
Defendants.)	CASE NO. _____

Come now the defendants in the above captioned cause and move to strike the following allegation from the complaint of the plaintiff, as last amended, and from each count thereof, separately and severally: "This action, as stated in the foregoing Count, is brought and prosecuted under the statutory cause of action against Master and Servant as provided in Title 7, Sec. 176, Code of Alabama, 1940, as amended", and for grounds of said motion to strike sets down and assigns the following, separately and severally, that is to say:

1. For that said allegation is unnecessary and prolix.
2. For that the Code section to which reference is made therein is unconstitutional under the laws of the State of Alabama.
3. For that said allegation is prejudicial to these defendants, and each of them, in that it purports to suggest that the lawsuit is brought with some statutory authority.
4. For that said allegation states merely the conclusion of the pleader.

INGE, TWITTY, DUFFY & PRINCE

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 1st day of Sept, 1966.

Attorney for

By:

James J. Duffy, Jr. - Designated Trial Attorney

FILED

SEP 8 1966

ALICE I. DUCK, CLERK REGISTERED

GARY RANDALL MERCHANT,

Plaintiff,

vs.

JAMES H. O'GWYNNS and GULF
COAST TRUCK AND EQUIPMENT
COMPANY, Incorporated, a
corporation,

Defendants.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

) CASE NO. 6619

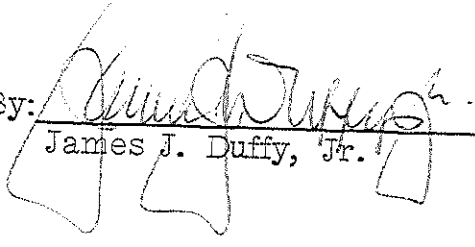
ANSWER OF DEFENDANTS

Come now the defendants in the above styled cause, and in answer to the complaint of the plaintiff, and to each count thereof, separately and severally, files the following pleas, separately and severally, that is to say:

1. This defendant is not guilty.
2. This defendant denies each and every one of the material allegations therein contained.

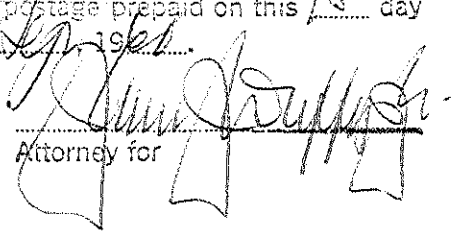
INGE, TWITTY, DUFFY & PRINCE

By:


James J. Duffy, Jr.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 15 day of September, 1966.


Attorney for

Filed: 9-15-66.

J. J. Maxwell

GARY RANDALL MERCHANT, a)	IN THE CIRCUIT COURT OF
minor, suing by his next)	
friend and father, SANGER)	BALDWIN COUNTY, ALABAMA
MERCHANT,)	
)	AT LAW
Plaintiff)	
)	
vs)	
)	
JAMES H. OGWYNNS and)	
GULF COAST TRUCK AND)	
EQUIPMENT COMPANY, Inc.)	
jointly and severally,)	
)	
Defendants)	CASE NO. <u>6619</u>

AMENDMENT TO COMPLAINT

Comes the Plaintiff in the above styled cause and, having married after obtaining the age of 18 years, amends his complaint as heretofore filed by striking from the style of said cause the words "a minor, suing by his next friend and father, Sanger Merchant".

Plaintiff further amends by more specifically designating the proper corporate name of the corporate defendant^{by}/adding the words "a corporation" after the words "Gulf Coast Truck and Equipment, Company, Inc.", and by striking the words in the style of said cause "jointly and severally"; so as to cause the style of said case as amended to read as follows:

GARY RANDALL MERCHANT,
Plaintiff

vs

JAMES H. OGWYNNS and GULF
COAST TRUCK AND EQUIPMENT
COMPANY, Incorporated, a
corporation,

Defendants

Plaintiff further amends by substituting for the original Counts One and Two of said complaint the following Counts:

COUNT "A"

The Plaintiff, Gary Randall Merchant, claims of the Defendants the sum of Seventy-five Thousand and no/100 (\$75,000.00) Dollars, as damages, for that heretofore on to-wit: the 28th day of July, 1964, while the Plaintiff

was riding in an automobile being operated along Alabama State Highway No. 59 at or near its intersection with 1st Street, public Streets or highways in the town of Summerdale, Baldwin County, Alabama, the Defendants so negligently operated an automotive vehicle or truck at said time and place as to cause the same to run into or collide with said automobile in which the Plaintiff was riding at said time and place, as aforesaid; and as a proximate consequence of the Defendants' said negligence the Plaintiff was injured and damaged as follows: he was caused to suffer severe personal injuries to his entire body; he was caused to suffer a severe whiplash injury or cervical neck sprain and back sprain; he was caused to be hospitalized for a long period of time and to seek the care and attention of doctors and nurses and medical treatment for his said injuries; he was caused to remain in traction for a long period of time and to wear a back brace and to change his sleeping habits from sleeping in a soft bed to sleeping on a board; he was caused to lose much time from his work and other usual and normal activities; he was caused to suffer great physical pain and mental anguish and will in the future continue to suffer great physical pain and mental anguish; he was caused to suffer permanent and partial disability and incapacity to perform normal occupational pursuits and other daily activities; he will be caused in the future to continue to seek medical attention and advice and to incur medical expenses for doctors' bills and other medical expenses in and about the care and treatment of his said injuries; and his capacity to earn has been materially and appreciably diminished; and he was caused to suffer permanent injuries; for all of which Plaintiff claims damages of the Defendants in the sum of \$75,000.00

COUNT "B"

The Plaintiff, Gary Randall Merchant, claims of the Defendants the sum of Seventy-five Thousand and no/100 (\$75,000.00) Dollars, as damages, for that he avers that on, to-wit: the 28th day of July, 1964, James H. Ogwynns, the agent, servant or employee of Gulf Coast Truck and Equipment Company, Incorporated, in charge of the operation or control of an automotive vehicle or truck on Alabama State Highway No. 59, at or near the intersection with 1st Street, public streets or highways in the town of Summerdale, Baldwin County, Alabama, and while thereon, while acting within the line or scope of his employment as such agent, servant or employee of Gulf Coast Truck and Equipment Company, Incorporated, wantonly injured Plaintiff by wantonly running said automotive vehicle or truck upon or against an automobile in which the Plaintiff was riding at said time and place and as a proximate consequence of said wanton conduct and said injuries to the Plaintiff, the Plaintiff suffered the following detailed hurts and injuries and the following losses and damages: he was caused to suffer severe personal injuries to his entire body; he was caused to suffer a severe whiplash injury or cervical neck sprain and back sprain; he was caused to be hospitalized for a long period of time and to seek the care and attention of doctors and nurses and medical treatment for his said injuries; he was caused to remain in traction for a long period of time and to wear a back brace and to change his sleeping habits from sleeping in a soft bed to sleeping on a board; he was caused to lose much time from his work and other usual and normal activities; he was caused to suffer great physical pain and mental anguish and will in the future continue to suffer great physical pain and mental anguish; he was caused to suffer permanent and partial disability and incapacity to perform normal occupational pursuits and other daily activities; he will be caused in the future to continue to seek medical attention and advice and to incur medical expenses for doctors' bills and

other medical expenses in and about the care and treatment of his said injuries; and his capacity to earn has been materially and appreciably diminished; and he was caused to suffer permanent injuries; for all of which Plaintiff claims damages of the Defendants in the sum of \$75,000.00.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ARTHUR EPPERSON and
JONES, FOWLER, PROPST & TOPAZI
By

Arthur Epperson
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that I have served a copy of the above and foregoing Pleading on all attorneys of record in this case, by mailing a copy of the same to them at their office addresses, postage prepaid, this the Thirso day of September 1966.

Arthur Epperson and
JONES, FOWLER, PROPST & TOPAZI

By *Arthur C. Epperson*
OF COUNSEL

FILED

1966
CLERK
REGISTER

GARY RANDALL MERCHANT, a) IN THE CIRCUIT COURT OF
minor, suing by his next friend) BALDWIN COUNTY, ALABAMA
and father, SANGER MERCHANT,)
Plaintiff,) AT LAW

vs.)

JAMES H. OGWYNNS, and GULF)
COAST TRUCK AND EQUIPMENT)
COMPANY, INC., jointly and)
severally,)

Defendants.)

CASE NO. 6619

DEMURRER

Come now James H. Ogwynns and Gulf Coast Truck and Equipment Company, Inc., separately and severally, and demur to the complaint of the plaintiff herein, and to each count thereof, separately and severally, and for grounds of demurrer set down and assign the following, separately and severally, that is to say:

1. For that it does not state facts sufficient to constitute a cause of action.
2. For that negligence is therein alleged merely as a conclusion of the pleader.
3. For that it is vague, indefinite and uncertain, in that it does not apprise this defendant with sufficient certainty against what act or acts of negligence this defendant is called upon to defend.
4. For that it does not appear with sufficient certainty what duty, if any, this defendant may have owed to the plaintiff.
5. For that it does not appear with sufficient certainty wherein this defendant violated any duty it may have owed to the plaintiff.
6. For that it does not sufficiently appear that this defendant owed any duty to the plaintiff which this defendant negligently failed to perform.
7. For that there does not appear sufficient causal connection between this defendant's alleged breach of duty and the plaintiff's alleged injuries and damages.
8. For that no facts are alleged therein to show that the plaintiff

sustained any damage or injury as the proximate result of any negligence or breach of duty on the part of this defendant.

9. For that it is not alleged with sufficient certainty where said accident occurred.

10. For that it is not alleged that the negligence complained of proximately caused the accident, the injuries and the damages complained of.

11. For that the averments thereof are conflicting and repugnant.

12. For that no causal connection appears between this defendant's alleged negligence and the injuries and damages complained of by the plaintiff.

13. For that it is not alleged that the willful or wanton conduct complained of proximately caused the accident, the injuries and damages complained of.

14. For that the facts averred in said complaint do not constitute willful or wanton negligence.

15. For aught that appears from said complaint, plaintiff's injuries and damages were not the direct and proximate result of any willful or wanton negligence on the part of defendant in this cause.

16. For that it is not alleged that the defendant willfully or wantonly injured the plaintiff.

17. For that the willful or wanton conduct complained of is but a conclusion of the plaintiff with no facts alleged in support thereof.

INGE, TWITTY, DUFFY & PRINCE

By: James J. Duffy, Jr.

James J. Duffy, Jr. - Designated
Trial Attorney

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 20th day of Aug., 1965.

James J. Duffy, Jr.
Attorney for

- 2 -

GARY RANDALL MERCHANT, a)
minor, suing by his next)
friend and father, SANGER)
MERCHANT)

Plaintiff)

VS.)

JAMES H. OGWYNNS, and)
GULF COAST TRUCK AND)
EQUIPMENT, COMPANY, Inc.)
jointly and severally,)

Defendants)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

6619

COUNT ONE

The plaintiff, Gary Randall Merchant, a minor suing by his father and next friend, Sanger Merchant, claims of the defendants, jointly and severally, and whose names are otherwise unknown to the plaintiff and if incorrect will be changed to the correct name by amendment when discovered by the plaintiff, the sum of FORTY THOUSAND DOLLARS (\$40,000.00) as damages for that he avers that on to-wit, the 28th day of July, 1964, James H. Ogwynns, the agent, servant or employee of Gulf Coast Truck and Equipment Company, Incorporated in charge of the operation or control of a truck on public highway number 59 at or near the intersection of said highway with First Street in the Town of Summerdale in Baldwin County, Alabama, while acting within the line or scope of his employment as such agent, servant or employee of Gulf Coast Truck and Equipment Company, Inc. ran said truck upon or against an automobile in which plaintiff was riding at or near said intersection of highway 59 and First Street, and by reason thereof and as the proximate result and consequence thereof the plaintiff received personal injuries in this, to-wit: he suffered severe Cervical sprain, whip lash and back strain, he was hospitalized for nine days with traction, he is required to wear a brace and sleep on a board, he has lost and continues to lose much time from his work and will lose much time from his work in the future, he was permanently injured from which injuries he suffered and continues to suffer great physical pain and mental anguish for all of which he claims damages as aforesaid.

COUNT TWO

The plaintiff, Gary Randall Merchant, a minor suing by his father and next friend Sanger Merchant, claims of the defendants jointly and severally, and whose names are otherwise unknown to the plaintiff and if incorrect will be changed to the correct name by amendment when discovered by the plaintiff, the sum of FORTY THOUSAND DOLLARS (\$40,000.00) as damages for that he avers that on to-wit, the 28th day of July, 1964, James H. Ogwynns, the agent, servant or employee of Gulf Coast Truck and Equipment Company, Inc. in charge of the operation or control of a truck on public highway number 59 at or near the intersection of said highway with First Street in the Town of Summerdale, Baldwin County, Alabama, while acting within the line or scope of his employment as such agent, servant or employee of Gulf Coast Truck and Equipment Company, Inc. willfully or wantonly injured plaintiff by willfully or wantonly running said truck upon or against an automobile in which the plaintiff was riding at or near said intersection of highway 59 and First Street, and by reason thereof the plaintiff received personal injuries in this to-wit, he suffered severe Cervical sprain, whip lash and back strain, he was hospitalized for nine days with traction, he is required to wear a back brace and sleep on a board, he has lost and continues to lose much time from his work and will lose much time from his work in the future, he was permanently injured from which injuries he suffered and continues to suffer great physical pain and mental anguish for all of which he claims damages as aforesaid.

Arthur C. Epperson
Attorney for the Plaintiff

The plaintiff demands
a trial by jury.

Arthur C. Epperson
Attorney for the Plaintiff

FILED
JUL 27 1965
ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6619

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James H. OGwynns & Gulf Coast Truck & Equipment
Co., Inc., Jointly & Severally

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 James H. OGwynns
& Gulf Coast Truck & Equipment Co., Inc., Jointly & Severally....., Defendant.....
by Gary Randall Merchant, a minor suing by his next friend & Father SANGER MERCHANT,
....., Plaintiff.....

Witness my hand this 27th day of July 1965

Alice J. Luck Clerk

447 Executed
Aug 4, 1965

2956-57
No. 6619 Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

GARY RANDALL MERCHANT, a minor suing
by his next friend and father
SANGER MERCHANT

Plaintiffs

vs.

JAMES H. OGWYNNS & GULF COAST TRUCK
& EQUIPMENT CO., Inc., Jointly &
Severally

Defendants

SUMMONS AND COMPLAINT

Filed July 27 1965

Alice J. Duck Clerk

Arthur C. Epperson

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

7-28-1965

Sheriff

I have executed this summons

this August 4 1965
by leaving a copy with

Mr. Sims Manager
Gulf Coast Truck and
Equipment Co

James H. Ogwynns

Ray D. Bridges Sheriff

W. Lewis Deputy Sheriff

BY
JUL 29 8 43
REC'D SHERIFF DEPT.
MOBILE COUNTY, ALA.

GARY RANDALL MERCHANT, a)
minor suing by his next friend)
and father, SANGER MERCHANT,)

Plaintiff,)

vs.)

JAMES H. OGWYNNS, and GULF)
COAST TRUCK AND EQUIPMENT)
COMPANY, INC., jointly and)
severally,)

Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6619

NOTICE OF DEPOSITIONS

TO: Arthur C. Epperson, Esquire
Foley, Alabama

You are hereby notified that the defendants in the above captioned cause will take the pretrial discovery depositions of the following witnesses on the 25th day of August, 1966, at the times and places designated. Said depositions are to be taken pursuant to and in accordance with Section 474 (1) Title 7, Alabama Code of 1940, as amended and recompiled, and will continue from day to day until the completion of same. The depositions are to be taken before Louis M. Hubbard, Jr., or before some other officer authorized by law to take depositions and you are invited to attend and examine the deponents. The deponents and the times and places for taking their said depositions are as follows:

Records Librarian, Doctors Hospital, Mobile, Alabama,
deposition to be taken at 1301 Merchants National Bank Building, Mobile,
Alabama, at 9:30 A. M.

Dr. Robert T. King, deposition to be taken at his offices
located at 1653 Springhill Avenue, Mobile, at 11:00 A. M.

Dr. Robert H. Mudd, deposition to be taken at his offices
located at 1653 Springhill Avenue, Mobile, Alabama at 4:00 P. M.

INGE, TWITTY, DUFFY & PRINCE

By:

James J. Duffy, Jr.
James J. Duffy, Jr.

FILED

AUG 23 1966

ALICE J. DICK, CLERK
REGISTER

*per mailed to
Arthur C. Epperson
8-23-66*

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

THOS. E. TWITTY
FRANCIS H. INGE (1902-1959)
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III

MAILING ADDRESS:

P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:

TWINING
TELEPHONE
433-5441

August 22, 1966

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: Case No. 6619
Merchant, et al vs. James H. Ogwynns, et al

Dear Mrs. Duck:

Confirming our conversation Thursday afternoon in connection with the captioned case, I requested that you issue a subpoena to each of three witnesses and these witnesses are:

Dr. Robert H. Mudd
1653 Springhill Avenue
Mobile, Alabama

Dr. Robert T. King
1653 Springhill Avenue
Mobile, Alabama

Records Librarian
Doctors Hospital
1700 Center Street
Mobile, Alabama

The subpoenas were to be for 4:00 P. M., August 25 for Dr. Mudd; 11:00 A. M., August 25, for Dr. King; 9:30 A. M., August 25 for Records Librarian of Doctors Hospital.

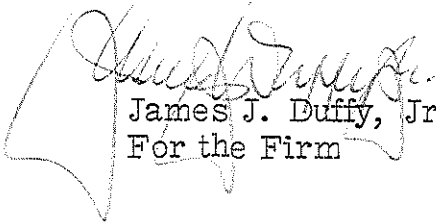
I am attaching herewith the notice for the taking of the depositions. Please file the notice. A copy of the same has been furnished to the attorney for the plaintiff.

Mrs. Alice Duck
August 22, 1966
Page Two

I asked for subpoenas duces tecum directing each of the witnesses to have with them at the appointed time and place the records pertaining to Gary Merchant.

With best regards, I remain

Yours cordially,



James J. Duffy, Jr.
For the Firm

JJD, jr:ns

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

THOS. E. TWITTY
FRANCIS H. INGE (1902-1959)
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MAILING ADDRESS:

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MOBILE, ALA.
36601

CABLE ADDRESS:

TWINING
TELEPHONE
433-5441

September 7, 1966

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Mnette, Alabama

Re: Gary Randall Merchant vs.
James H. OGwynns and Gulf Coast
Truck and Equipment Company

Dear Mrs. Duck:

Please file the attached pleading on behalf of the
defendants in the captioned litigation.

With much appreciation,

Yours very truly,



James J. Duffy, Jr.
For the Firm

JJD, jr:ns

Attachment

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

THOS. E. TWITTY
FRANCIS H. INGE (1902-1959)
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III

MAILING ADDRESS:

P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:

TWINING
TELEPHONE
433-5441

April 7, 1966

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: Case No. 6619 - Merchant vs.
Gulf Coast Truck and Equipment Company, Inc.

Dear Mrs. Duck:

Enclosed you will please find the notice for the taking of two depositions in the above captioned lawsuit pending in the Circuit Court of Baldwin County. Please issue a subpoena to Dr. Marvin H. Taylor directing him to appear in his offices on the 21st day of April, 1966, at 10:00 A. M. for the purpose of testifying at his said deposition. Please issue the subpoena to Dr. Taylor duces tecum directing him to bring with him at said time and place all notes, records, charts, memoranda, x-ray reports, reports, and any and all other documentary materials pertaining to his examination, care and treatment of Gary Randall Merchant.

Please subpoena Gary Randall Merchant, directing him to appear at the offices of his attorney, Mr. Arthur C. Epperson, located in Foley, Alabama, at 11:00 A. M. on the 21st day of April, 1966, for the purpose of testifying at his pretrial discovery deposition.

Awaiting your replies, I remain

Yours cordially,


James J. Duffy, Jr.
For the Firm

JJD, jr:ns

Enclosure

GARY RANDALL MERCHANT, a) IN THE CIRCUIT COURT OF
minor suing by his next friend)
and father, SANGER MERCHANT,) BALDWIN COUNTY, ALABAMA

Plaintiff,)

vs.) AT LAW

JAMES H. OGWYNNNS, and GULF)
COAST TRUCK AND EQUIPMENT)
COMPANY, INC., jointly and)
severally,)

Defendants.) CASE NO. 6619

NOTICE OF DEPOSITIONS

To: Arthur C. Epperson, Esquire
Foley, Alabama

You are hereby notified that James H. Ogwynns and Gulf Coast Truck and Equipment Company, Inc., will take the pretrial discovery depositions of Dr. Marvin H. Taylor and the plaintiff, Gary Randall Merchant, on the 21st day of April, 1966. The deposition of Dr. Taylor will be taken at 10:00 A. M. at his offices located in Foley, Alabama. The deposition of Gary Randall Merchant will be taken at 11:00 A. M. in the office of his attorney, Arthur E. Epperson.

Said depositions will be taken pursuant to and in accordance with Act No. 375 of the Legislature of Alabama, 1955, and will continue from day to day until the completion of same. You are invited to attend and examine the deponents.

INGE, TWITTY, DUFFY & PRINCE

By: 

James J. Duffy, Jr.

Dated: April 7, 1966

FILED

APR 8 1966

ALB. CLK. REC'D

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

THOS. E. TWITTY
FRANCIS H. INGE (1902-1959)
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:

P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:

TWINING
TELEPHONE
433-5441

August 20, 1965

Mrs. Alice V. Duck
Clerk, Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing herewith a demurrer in each of the following cases: Wyman Dale Stabler, Gary Randall Merchant, Sanger Merchant and Ruby Merchants vs. James H. Ogwynns and Gulf Coast Truck and Equipment Company, Inc., with the request that you place the demurrer in each case on file.

The cases have just been filed and there is a considerable amount of work to be done in connection with preparing them for trial so I assume that they will not be placed on the trial docket of the Circuit Court of Baldwin County until your spring term. I would appreciate your confirmation in this regard.

Awaiting your replies and with best regards,

Cordially,


James J. Duffy, Jr.
For the Firm

JJDjr/mn
Enclosures

6619 Gary Randall Merchant
vs Joe St. Olympe

JURY LIST - MARCH 6, 1967 - SPRING SESSION

1. Ball, Johnnie Ruth, Bookkeeper, Bay Minette
2. Baskin, Lavon, - - - Bay Minette
3. Benik, Edward, Farmer, Belforest
4. Benton, Thomas H., Farmer, Gulf Shores
5. Cooper, Claude, Farmer, Rosinton
6. Pierce, Arthur, Insurance, Fairhope
7. Porter, Darrell Lee, Utility Man, Summerdale
8. Mannich, Arthur, Merchant, Fairhope
9. Matthews, Reid, Furniture Store Oper., Robertsdale
10. Clemmons, W. P., Carpenter, Fairhope
11. Cleveland, Lyle F., Nurseryman, Foley
12. Dumas, Charles, Merchant, Foley
13. Crawford, Harry E., Operator, Elberta
14. Campbell, Acie, Farmer, Rosinton
15. Bush, Hobson, Farmer, Bay Minette
16. Hesse, Henry W., Linesman, Foley
17. Harris, Guy H., Merchant, Foley
18. Hastie, Joe H., Merchant, Stockton
19. McGowin, Randolph, Jr., Store Keeper, Bay Minette
20. McMillan, Raymond N., Farmer, Stockton
21. Sanders, William G., Real Estate, Gulf Shores
22. Spader, Aubrey, Office, Robertsdale
23. Spivey, Roy, - - Bon Secour
24. Stripling, Fred, Television Repair, Robertsdale
25. Thompson, Robert W., Merchant, Foley
26. Venson, Cecil, Civil Service, Stapleton
27. White, John R., Utilities Man, Foley
28. Parker, Floyd B., Millman, Stockton
29. Nail, Wilber C., Farmer, Bon Secour
30. Sanders, E. Frank, Banker, Foley
31. Koehler, Frank, Farmer, Lillian
32. Beverly, Marvin, Laborer, Robertsdale
33. Blair, Dorothy L., - - Stapleton
34. Boeschen, Sarah, - - Bay Minette
35. Nally, Glenn, Merchant, Robertsdale
36. Crosby, James W., Bookkeeper, Foley
37. Long, Volton, Electrician, Foley
38. Bryans, Ewing E., Reserve Fleet, Bay Minette
39. Weeks, William, Laborer, Magnolia Springs
40. Earls, Doris K., --- Bay Minette
41. DuBrock, George, Cabinet Maker, Fairhope
42. Durant, Wilma W., --- Bromley
43. Durant, Percy N., Merchant, Bay Minette
44. McDonald, Luther, Postman, Foley
45. Jones, Sanford, Newport, Bay Minette
46. Flowers, John B., Farmer, Gulf Shores
47. Akers, Redus M., Insurance, Bay Minette
48. Fuller, David, Motel, Spanish Fort, Daphne
49. Minote, Sherman R., Butcher, Robertsdale
50. Wankins, C. E., Farmer, Robertsdale
51. Duck, Jos Willison, Brookley Field, Bay Minette

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