

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon L. D. Owen, Jr. 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 Emmett Luther Rogers.

WITNESS my hand, this 25 day of March, 1965.

Alice J. Duck
Clerk

EMMETT LUTHER ROGERS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
L. D. OWEN, JR.,	X	AT LAW
Defendant.	X	6458 6458

1.

The Plaintiff claims of the Defendant the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS, as damages, for that heretofore on to-wit, the 3rd day of May, 1964, the Plaintiff was operating his automobile along or upon U. S. 31, at a point which is approximately 1.7 miles South of the city limits of Bay Minette, Baldwin County, Alabama, which is a public road in Baldwin County, Alabama. The Plaintiff avers that at said time and place, the Defendant so negligently operated his vehicle as to cause it to collide with the Plaintiff's automobile and as a direct and proximate result of said negligence of the Defendant, the Plaintiff was injured as follows: His automobile was bent, twisted and torn and rendered less valuable. He received multiple lacerations on his face and mouth. His lower jaw was fractured. His upper maxilla bone was crushed. His teeth were broken and damaged to such an extent that they had to be removed and replaced with false teeth. His cheeks were cut. He received multiple

contusions on his chest and head. He was caused to suffer much physical and mental pain and anguish. He was caused to spend large sums of money for hospitalization, for drugs, for doctors and dentists, to treat and cure his injuries. He was permanently injured. He received a large disfigureing scar on his face, all to the loss of the Plaintiff in the aforesaid amount.

2.

The Plaintiff claims of the Defendant the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS, as damages, for that heretofore on to-wit, the 3rd day of May, 1964, the Plaintiff was operating his automobile along or upon U. S. 31, at a point which is approximately 1.7 miles South of the city limits of Bay Minette, Baldwin County, Alabama, which is a public road in Baldwin County, Alabama. The Plaintiff avers that at said time and place, the Defendant so negligently operated his vehicle as to cause it to collide with the Plaintiff's automobile and as a direct and proximate result of said negligence of the Defendant, the Plaintiff was injured as follows: His automobile was bent, twisted and torn and rendered less valuable. He received multiple lacerations on his face and mouth. His lower jaw was fractured. His upper maxilla bone was crushed. His teeth were broken and damaged to such an extent that they had to be removed and replaced with false teeth. His cheeks were cut. He received multiple contusions on his chest and head. He was caused to suffer much physical and mental pain and anguish. He was caused to spend large sums of money for hospitalization, for drugs, for doctors and dentists, to treat and cure his injuries. He was permanently injured. He received a large disfigureing scar on his face. His wife was killed and he lost her services and consortium, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS & BRANTLEY

BY:

William M Brantley
Attorney for the Plaintiff

Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

BY:

William M Brantley
Attorney for the Plaintiff

FILED

MAR 25 1965

ALICE L. DUCK, CLERK
REGISTER

EX-2-26-65

~~7757~~ 6458

EMMETT LUTHER ROGERS,

Plaintiff,

vs:

L.D. OWEN, JR.,

Defendant.

Received 25 day of March 1965
and on 26 day of March 1965
served a copy of the within D+C
on L. D. Owen, Jr.

by service on _____

TAYLOR WILKINS, Sheriff

By W. A. Zellerbach, S.

om

FILED

MAR 25 1965

ALICE L. DICK, CLERK
REGISTER

Wilters & Brantley
Attorneys at Law

EMMETT LUTHER ROGERS,	:	IN THE CIRCUIT COURT
Plaintiff	:	OF BALDWIN COUNTY,
v.	:	ALABAMA
L. D. OWEN, JR.,	:	AT LAW
Defendant	:	CASE NO. XXXX 6458

PLEA IN ABATEMENT

Comes now the defendant in the above-styled cause, and appears solely and specially for the purpose of filing the following separate and several pleas in abatement and for no other purpose, and, pleading in abatement, assigns the following separate and several pleas in abatement to each separate and several count of the complaint filed herein, separately and severally:

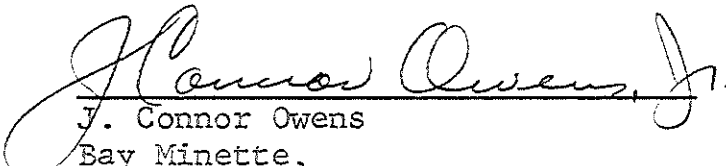
1. The plaintiff cannot maintain this action because there is presently pending in this court in case number 6228 an action for the same cause brought by the plaintiff in this case against the defendant in this case.


2. The plaintiff cannot maintain this action because there is presently pending in this court in case number 6228, which was filed prior to the filing of the complaint in this case, a cause of action brought by the plaintiff in this case against the defendant in this case for the same cause.

3. The plaintiff cannot maintain this action because there is presently pending in this court in a case which was filed prior to the filing of the complaint in this case, namely, in case number 6228, a cause of action brought by the plaintiff in this case against the defendant in this case for the same cause; hence, this cause of action is barred by

Title 7, Section 146, Code of Alabama of 1940, as amended.

WHEREFORE, this suit should be abated.


J. Connor Owens
Bay Minette,
Alabama



622 First National Bank Building
Mobile, Alabama

OF COUNSEL:

HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON

State of Alabama:
County of Mobile:

Before me, the undersigned Notary Public in and for
~~said county in said state~~, personally appeared Louis E.
Braswell, who, being by me first duly sworn, doth depose
and say that he is one of the attorneys for the defendant
and that the facts set forth in the foregoing pleas in
abatement are true and correct.


Louis E. Braswell

Subscribed and sworn to before
me on this 2nd day of April,
1965.


Notary Public, Mobile County, Alabama

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct
copy of the foregoing pleading to Robert M. Braswell
Braswell, Esq., Attorney for Plaintiff
by depositing a copy of same in the United States mail,
postage prepaid, addressed to said attorney at his off-
ice in Mobile, Alabama on this, the.....day of
....., 19......

FILED

APR 23 1965

ALICE L. DICK, CLERK
REGISTER

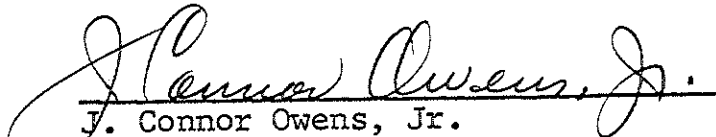
EMMETT LUTHER ROGERS,	:	IN THE CIRCUIT COURT OF
Plaintiff	:	BALDWIN COUNTY, ALABAMA
v.	:	AT LAW
L. D. OWEN, JR.,	:	
Defendant.	:	Case No. 6458


MOTION TO STRIKE

Comes now the defendant in the above-styled cause,
and moves the Court to strike the following sentence from
the complaint:

"His wife was killed and he lost her services and
consortium, all to the loss of the plaintiff in the
aforesaid amount."

In support of this motion the defendant avers that
said sentence refers to an improper element of damage
in that no recovery can be had in this action for the
death of the plaintiff's wife, his loss of her services
because of her death, or his loss of consortium because
of her death.


J. Connor Owens, Jr.
Bay Minette, Alabama


622 First National Bank Building
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON

FILED
SEP 13 1965
ALICE L. DUCK, CLERK
REGISTER

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true
and correct copy of the foregoing pleading to
Tolbert M. Brantley, Esquire, Attorney for the
Plaintiff, by depositing a copy of same in the

United States mail, postage prepaid, addressed
to said attorney at his office in Bay Minette,
Alabama, on this 13 day of September, 1965.

James Owen Jr.

FILED

SEP 13 1965

ALICE L. DUCK, CLERK
REGISTER

EMMETT LUTHER ROGERS, : IN THE CIRCUIT COURT OF
Plaintiff : BALDWIN COUNTY, ALABAMA
v. : AT LAW
L. D. OWEN, JR., :
Defendant. : Case No. 6458

A N S W E R

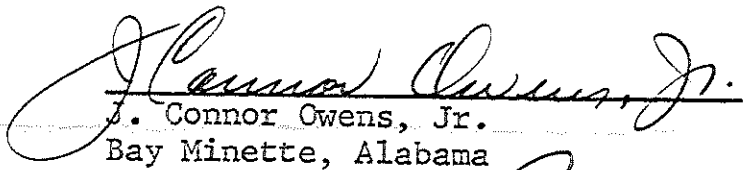
Comes now the defendant in the above-styled cause,
and for answer to each separate and several count of the
complaint filed herein, assigns the following separate
and several pleas, separately and severally:

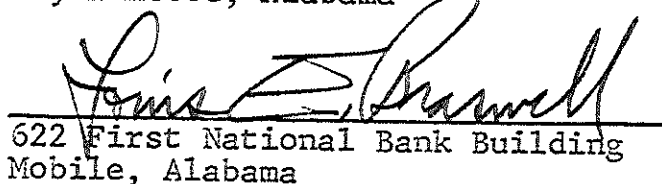
1. Not guilty.
2. The material allegations thereof are untrue.
3. At the time and place described in said count,
on, to-wit, May 3, 1964, on U. S. 31 approximately 1.7
miles south of the city limits of Bay Minette, Baldwin
County, Alabama, where said U. S. 31 is a public road in
Baldwin County, Alabama, the plaintiff himself so negli-
gently operated a motor vehicle as to contribute proximately
and directly to the collision and to the injuries and damages
described in said count; hence, plaintiff ought not recover.

FILED

SEP 13 1964

ALICE L. DICK, CLERK


J. Connor Owens, Jr.
Bay Minette, Alabama


622 First National Bank Building
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to Tolbert M. Brantley, Esquire, Attorney for the Plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Bay Minette, Alabama, on this 13 day of September, 1965.

J. Conrad Owens, Jr.

FILED

SEP 18 1965

ALICE I. DUCK, CLERK
REGISTER

EMMETT LUTHER ROGERS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
L. D. OWEN, JR.,	X	AT LAW
Defendant.	X	

Comes now the Plaintiff in the above styled cause and amends
Count 2 of said Complaint by striking therefrom the following:

His wife was killed and he lost her services and consortium.

WILTERS & BRANTLEY

BY: *Robert M Brantley*
Attorney for the Plaintiff

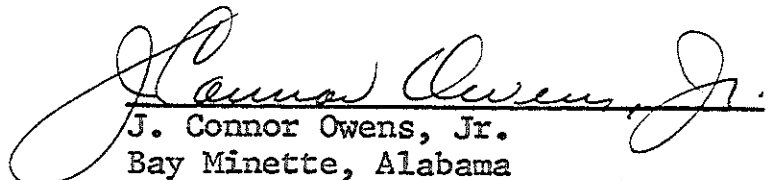
FILED
NOV 4 1965
MICHAEL DUCK, CLERK
REGISTER

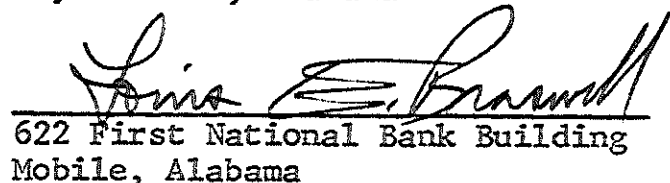
EMMETT LUTHER ROGERS,	:	IN THE CIRCUIT COURT OF
Plaintiff	:	BALDWIN COUNTY, ALABAMA
v.	:	AT LAW
L. D. OWEN, JR.,	:	
Defendant.	:	Case No. 6458

A N S W E R

Comes now the defendant in the above-styled cause, and for answer to each separate and several count of the complaint filed herein, as last amended, assigns the following separate and several pleas, separately and severally:

1. Not guilty.
2. The material allegations thereof are untrue.
3. At the time and place described in said count, on, to-wit, May 3, 1964, on U. S. 31 approximately 1.7 miles south of the city limits of Bay Minette, Baldwin County, Alabama, where said U. S. 31 is a public road in Baldwin County, Alabama, the plaintiff himself so negligently operated a motor vehicle as to contribute proximately and directly to the collision and to the injuries and damages described in said count; hence, plaintiff ought not recover.


 J. Connor Owens, Jr.
 Bay Minette, Alabama


 622 First National Bank Building
 Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to Tolbert M. Brantley, Esquire, attorney for the plaintiff, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Bay Minette, Alabama, on this 15 day of November, 1965.

James Owen Jr.

FILED

NOV 15 1965

ALICE J. DICK, CLERK
REGISTER

8500

EMMETT LUTHER ROGERS,
Plaintiff,
VS.
L. D. OWEN, JR.,
Defendant.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA. AT
LAW. NO. 6458
September 1, 1965.

A P P E A R A N C E:

FOR THE PLAINTIFF:

Hon. Tolbert M. Brantley,
Bay Minette, Alabama.

FOR THE DEFENDANT:

Hon. Louis Braswell,
Mobile, Alabama

Hon. J. Connor Owens, Jr.,
Bay Minette, Alabama.

MR. BRASWELL: I would like for this to be marked for
identification as Defendant's Exhibit A.

THE COURT: Can't you all enter a stipulation or what you
could prove - -

MR. BRASWELL: Let the record show that we would have
proved this morning that this particular suit styled Rogers
vs. Owen, No. 6458, in the Circuit Court of Baldwin County,
Alabama, was filed on March 25, 1965 and that at the time that
suit was filed another suit by the same Plaintiff and against
the same defendant, known as case No. 6228 was pending in the
same Court and that suit was filed on October 8, 1964.

THE COURT: Go on and let the record show that the suit
filed first only asked damages for the injuries or loss of
automobile and contained no claim for personal injuries - that
the second suit does have a claim for damages for - to the
person of the Plaintiff as well as a claim for damages to the
automobile.

MR. BRASWELL: Would you stipulate also that these are true and correct copies of the pleading?

MR. BRANTLEY: Yes.

MR. BRASWELL: In suit no 6458 and the attached pleadings and exhibits in case no. 6228?

MR. BRANTLEY: Yes.

MR. BRASWELL: We introduce pleadings in case 6228 as Defendant's Exhibit 2, and pleadings in case no. 6458 as Defendant's Exhibit 1.

MR. BRANTLEY: Case No. 6228 was filed by Mr. C.M.A. Rogers and the case we are hearing here today was filed by our firm.

THE COURT: The plea in abatement filed by the Defendant is denied.

MR. BRASWELL: We except to that ruling.

THE COURT: Let the record show that the Court will either permit the Plaintiff in the first case to dismiss, or the Court will combine the two cases prior to the trial.

MR. BRASWELL: We except.

C E R T I F I C A T E:

I hereby certify that the foregoing is a true and correct transcript of the proceedings had in open Court, before Hon. Telfair J. Mashburn, Judge of said Court, in the captioned case, on September 1, 1965.

This the 1st day of September, 1965.

Lester D. Dunning
Court Reporter

STATE OF ALABAMA
BALDWIN COUNTY

Depts Ead A For JH -

TO ANY SHERIFF OF THE STATE OF ALABAMA:

Depts Ead 1

You are hereby commanded to summon L. D. Owen, Jr. 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 Emmett Luther Rogers.

WITNESS my hand, this 25 day of March, 1965.

Alise J. Luck
Clerk

EMMETT LUTHER ROGERS,

Defendants

Plaintiff,

I

IN THE CIRCUIT COURT OF

Vs.

I

BALDWIN COUNTY, ALABAMA

L. D. OWEN, JR.,

I

AT LAW

Defendant.

I

~~6458~~ 6458

1.

The Plaintiff claims of the Defendant the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS, as damages, for that heretofore on to-wit, the 3rd day of May, 1964, the Plaintiff was operating his automobile along or upon U. S. 31, at a point which is approximately 1.7 miles South of the city limits of Bay Minette, Baldwin County, Alabama, which is a public road in Baldwin County, Alabama. The Plaintiff avers that at said time and place, the Defendant so negligently operated his vehicle as to cause it to collide with the Plaintiff's automobile and as a direct and proximate result of said negligence of the Defendant, the Plaintiff was injured as follows: His automobile was bent, twisted and torn and rendered less valuable. He received multiple lacerations on his face and mouth. His lower jaw was fractured. His upper maxilla bone was crushed. His teeth were broken and damaged to such an extent that they had to be removed and replaced with false teeth. His cheeks were cut. He received multiple

~~contusions on his chest and head. He was caused to suffer much~~
physical and mental pain and anguish. He was caused to spend large sums of money for hospitalization, for drugs, for doctors and dentists, to treat and cure his injuries. He was permanently injured. He received a large disfigureing scar on his face, all to the loss of the Plaintiff in the aforesaid amount.

2.

The Plaintiff claims of the Defendant the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS, as damages, for that heretofore on to-wit, the 3rd day of May, 1964, the Plaintiff was operating his automobile along or upon U. S. 31, at a point which is approximately 1.7 miles South of the city limits of Bay Minette, Baldwin County, Alabama, which is a public road in Baldwin County, Alabama. The Plaintiff avers that at said time and place, the Defendant so negligently operated his vehicle as to cause it to collide with the Plaintiff's automobile and as a direct and proximate result of said negligence of the Defendant, the Plaintiff was injured as follows: His automobile was bent, twisted and torn and rendered less valuable. He received multiple lacerations on his face and mouth. His lower jaw was fractured. His upper maxilla bone was crushed. His teeth were broken and damaged to such an extent that they had to be removed and replaced with false teeth. His cheeks were cut. He received multiple contusions on his chest and head. He was caused to suffer much physical and mental pain and anguish. He was caused to spend large sums of money for hospitalization, for drugs, for doctors and dentists, to treat and cure his injuries. He was permanently injured. He received a large disfigureing scar on his face. His wife was killed and he lost her services and consortium, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS & BRANTLEY

BY:

Sam M Brantley
Attorney for the Plaintiff

Plaintiff demands a trial by jury.

WILTERS & BRANTLEY

BY:

Sam M Brantley
Attorney for the Plaintiff

FILED

MAR 25 1985

ALICE J. DUCK, CLERK
REGISTER

~~7757~~ 6458

EMMETT LUTHER ROGERS,

Plaintiff,

vs:

L.D. OWEN, JR.,

Defendant.

subscribed 25 day of March 1965
at 26 day of March 1965
in and among the within D.C.
L.D. Owen, Jr.
/ service on _____

TAYLOR WILKINS, Sheriff
W. A. Zellerbach, S.
om

FILED

MAR 25 1965

ALICE I. THICK, CLERK
REGISTER

Wilters & Brantley
Attorneys at Law

EMMETT LUTHER ROGERS, : IN THE CIRCUIT COURT
Plaintiff : OF BALDWIN COUNTY,
v. : ALABAMA
L. D. OWEN, JR., : AT LAW
Defendant : CASE NO. ~~XXX~~
6458

PLEA IN ABATEMENT

Comes now the defendant in the above-styled cause, and appears solely and specially for the purpose of filing the following separate and several pleas in abatement and for no other purpose, and, pleading in abatement, assigns the following separate and several pleas in abatement to each separate and several count of the complaint filed herein, separately and severally:


1. The plaintiff cannot maintain this action because there is presently pending in this court in case number 6228 an action for the same cause brought by the plaintiff in this case against the defendant in this case.

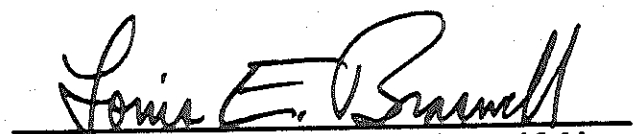
2. The plaintiff cannot maintain this action because there is presently pending in this court in case number 6228, which was filed prior to the filing of the complaint in this case, a cause of action brought by the plaintiff in this case against the defendant in this case for the same cause.

3. The plaintiff cannot maintain this action because there is presently pending in this court in a case which was filed prior to the filing of the complaint in this case, namely, in case number 6228, a cause of action brought by the plaintiff in this case against the defendant in this case for the same cause; hence, this cause of action is barred by

Title 7, Section 146, Code of Alabama of 1940, as amended.

WHEREFORE, this suit should be abated.


J. Connor Owens
Bay Minette,
Alabama



622 First National Bank Building
Mobile, Alabama

OF COUNSEL:

HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON

State of Alabama:
County of Mobile:

Before me, the undersigned Notary Public in and for said county in said state, personally appeared Louis E. Braswell, who, being by me first duly sworn, doth depose and say that he is one of the attorneys for the defendant and that the facts set forth in the foregoing pleas in abatement are true and correct.


Louis E. Braswell

Subscribed and sworn to before
me on this 2nd day of April ,
1965.


Notary Public, Mobile County, Alabama

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to Robert M. Braswell, Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Mobile, Alabama on this, the day of, 19

FILED

APR 23 1965

ALICE I. DUCK, CLERK
REGISTER

C E R T I F I C A T E

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

State of Alabama:

County of Baldwin:

I, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, State of Alabama, do hereby certify that the annexed 6 page are true and correct copies of all of the pleadings in the case of Emmett Luther Rogers, Plaintiff v. L. D. Owen, Jr., Defendant, Case Number ⁶⁴⁵⁸~~1957~~, Circuit Court of Baldwin County, Alabama, as the same remain of record in my office.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of the said Court, at Office in the City of Bay Minette, Baldwin County, Alabama, this the 24 day of May, 1965.

Alice J. Duck
Clerk, Circuit Court,
Baldwin County, Alabama

Affix seal here

W. J. E. E.
EMMETT L. ROGERS,

Plaintiff,

-vs-

L. DICK OWEN, JR.,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW NO. 6424

COUNT ONE

Plaintiff claims of the Defendant the sum of One Thousand Five Hundred and No/100 (\$1500.00) Dollars as damages, for that heretofore and on, to-wit, May 3, 1964, the Defendant did so negligently operate his motor vehicle on U. S. Highway No. 31 at a point, to-wit, 324 feet South of Alabama Power pole #12/406, said highway at said point being a public highway in Baldwin County, Alabama, as to cause or allow the same to run into, upon or against the automobile of the Plaintiff, and as a direct and proximate result of the negligence of the Defendant the Plaintiff's automobile was badly bent, broken and smashed; all as a direct and proximate result of the negligence of the Defendant as aforesaid, hence this suit.

McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By 

Attorneys for Plaintiff

The Defendant, L. Dick Owen,
may be served in the Probate
Court of Baldwin County,
Alabama.

Page.....

State of Alabama

Baldwin County

CIRCUIT COURT

TT L. ROGERS

Plaintiffs

vs.

L. D. OWEN, Jr

Defendants

Summons and Complaint

Filed 10-8-64 19

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

10/8/64

Sheriff

I have executed this summons

this 9 Oct 1964

by leaving a copy with

L. D. Owen Jr

Jayles J. Wilkins Sheriff
W. O. Garner Deputy Sheriff

O m

SUMMONS AND COMPLAINT

Form No. 20

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 6228

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon L. D. Owen, 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

L. D. Owen, Jr, Defendant

by Emmett L. Rogers

, Plaintiff

Witness my hand this 8 day of October 1964

Alfred J. Smith, Clerk

EMMETT L. ROGERS, : IN THE CIRCUIT COURT OF
Plaintiff : BALDWIN COUNTY, ALABAMA,
vs. : AT LAW
L. DICK OWEN, JR., :
Defendant. : Case No. 6228

A N S W E R

Comes now the defendant in the above-styled cause and for answer to each count of the complaint filed herein assigns the following separate and several pleas, separately and severally:

1. The material allegations thereof are untrue.
2. Not guilty.
3. At the time and place described in the complaint the plaintiff so negligently operated a motor vehicle as to contribute proximately and directly to the injuries and damages complained of; hence, plaintiff ought not recover.

Louis E. Brumell
622 First National Bank Building
Mobile, Alabama
Attorney for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE,
GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing pleading to C. M. A. Rogers, Esq., Attorney for Plaintiff by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office in Mobile, Alabama on this, the 3rd day of November, 19 64.

Louis E. Brumell

FILED

NOV

ALICE I. DICK, CLERK
RECORDED

C E R T I F I C A T E

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

State of Alabama:

County of Baldwin:

I, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, State of Alabama, do hereby certify that the annexed 4 page are true and correct copies of all of the pleadings in the case of Emmett L. Rogers, Plaintiff v. L. Dick Owen, Jr., Defendant, Case Number 6228, Circuit Court of Baldwin County, Alabama, as the same remain of record in my office.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of the said Court, at Office in the City of Bay Minette, Baldwin County, Alabama, this the 24 day of May, 1965.

Alice J. Duck
Clerk, Circuit Court,
Baldwin County, Alabama

Affix seal here