

Wm Leroy Patton 766757
vs.
Samuel Wayne Floyd

WIT LIST - JUNE 13, 1966

1. Agerton, R.H., Jr., Newport, Bay Minette
2. Allen, James B., Jr., Farmer, Lillian
3. Barnhill, David, Postmaster, Robertsedale
4. Bodden, C.A., Ala. Power Co., Bay Minette
5. Bray, S.A., Civil Service, Spanish Fort
6. Bruhn, Henry C., Civil Service, Elberta
7. Buchanan, B. rtram, Grand Hotel, Fairhope
8. Bulman, George N., Shipyard, Fairhope
9. Burmeister, Fritiz, Farmer, Fairhope
10. Casteel, Jim, Brookley Field, Elseanor
11. Coleman, Cecil, Brookley Field, Bay Minette
12. Chestang, J.C., Civil Service, Stapleton
13. Crawford, Russell M., Electrician, Bay Minette
14. Crosby, John D., Jr., Millman, Bay Minette
15. Duffee, Kenneth, Brookley Field, Stockton
16. Dukes, Dories, Merchant, Foley
17. Egerton, James W., Farmer, Bay Minette
18. Gable, Bill, Laborer, Fairhope
19. Garner, Carey, Klemps, Fairhope
20. Garrick, Woodrow, Southern Auto Parts, Fairhope
21. Hadley, Shomo, Street Dept., Foley
22. Holmes, Ernest, Clerk, Bay Minette
23. Humphrey, Charles C., Salesman, Bay Minette
24. Kendrick, Rivers, Farmer, Robertsedale
25. Langham, Ernest, Carpenter, Fairhope
26. Lett, Leroy, Brookley Field, Daphne
27. Little, Clyde, Mechanic, Bay Minette
28. Long, Alfred, Farmer, Stockton
29. McGill, Harold B., Merchant, Perdido
30. McKinley, Alex D., Post Office, Bay Minette
31. Morris, Ossie Victor, Farmer, Gateswood
32. Mosley, A.A., Builder, Stapleton
33. Pittman, Joe T., Farmer, Gateswood
34. Sheldon, Edward, Brick Layer, Fairhope
35. Smith, Sidney K., State Employee, Bay Minette
36. Stewart, Aubrey J., Farmer, Rabon
37. Stewart, Frank, State Emp., Gulf Shores
38. Still, Harry, Merchant, Bay Minette
39. Sute, Anthony, Banker, Foley
40. Thompson, Joseph, Newport Industry, Bay Minette
41. Waters, J. Douglas, Farmer, Gateswood
42. Harrington, Allen, Grand Hotel, Fairhope

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P XXXX XXXXX XXXX

D XXXX XXXXX XXXX

Law Offices
JONES, FOWLER, PROPST & TOPAZI
Suite 1532
The 2121 Building
BIRMINGHAM, ALABAMA 35203

Richard L. Jones
William G. Fowler
Jack E. Propst
Gerald S. Topazi

June 14, 1966

Area Code 205
Telephone 323-6348

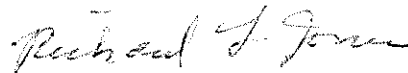
Mr. Ferris S. Ritchey, Jr.
Attorney at Law
Frank Nelson Building
Birmingham, Alabama

Re: Mrs. Jimira Nell Blow Elder,
as Executrix of the Estate of
J. R. Blow, deceased
vs: Willie Ann Blow

Dear Mr. Ritchey:

This is to notify you that your Plea in Abatement in
the above-styled cause is set for hearing at 11:00 a.m.,
Wednesday, June 22, before the Presiding Judge, The
Honorable Thomas E. Huey, Jr.

Sincerely yours,



RICHARD L. JONES

RLJ/bl

cc: The Honorable Thomas E. Huey, Jr.
Presiding Judge
Tenth Judicial Circuit
Jefferson County Courthouse
Birmingham, Alabama

Mr. Arthur Epperson
Attorney at Law
P.O. Box 716
Foley, Alabama

WILLIAM V. DUCK
DUCK & LACEY
Attorneys at Law
P. O. DRAWER A-J - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO Mrs. Alice J. Duck
Bay Minette, Ala.

DATE November 8, 1965

Re: William Leroy Patton, Jr. vs. Samuel Wayne Floyd

Dear Mrs. Duck:

Enclosed is Bill of Complaint to be filed
together with copy of same and Summons to
be served.

Sincerely,

SIGNED

DATE

SIGNED

FORM AVAILABLE FROM GRAYARC CO., INC.
THIRD AVE., B'KLYN 32, N. Y.

PERSON ADDRESSED RETURN THIS COPY TO SENDER

WILLIAM LEROY PATTON, JR.,)

Plaintiff,)

vs.)

SAMUEL WAYNE FLOYD,)

Defendant.)


IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


AT LAW

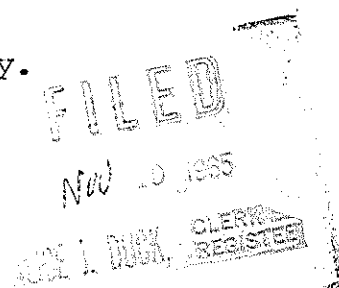
no. 6757

Plaintiff claims of the Defendant the sum of SEVEN HUNDRED FIFTY AND NO/100 (\$750.00) DOLLARS as damages for that heretofore on, to-wit: the 29th day of September, 1965, the Plaintiff was operating his motor vehicle along Church Street in a southerly direction, in the City of Fairhope, County of Baldwin, State of Alabama, to-wit: at its intersection with Fairhope Avenue, which was then and there a public highway in Baldwin County, Alabama, and the Defendant so negligently operated his motor vehicle, at said time and place as to run into, upon or against Plaintiff's automobile, and as a proximate consequence thereof, Plaintiff's automobile was damaged and rendered a total loss, all to his great damage as aforesaid; hence this suit.


ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands a trial by jury.


ATTORNEY FOR PLAINTIFF



we find for Plaintiff in the amount of
\$400. ~~plus a reasonable attorney fee.~~

Frank Stewart Foreman

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonSAMUEL WAYNE FLOYD

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.....

SAMUEL WAYNE FLOYD

byWILLIAM LEROY PATTON, JR., Defendant.....

Witness my hand this.....10.....day of.....Nov.....1965.....

EX-11-15-65

Deirdre J. Duck

Clerk

No. 6757

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WILLIAM LEROY PATTON, JR.

Plaintiffs

vs.

SAMUEL WAYNE FLOYD

Defendants

SUMMONS AND COMPLAINT

Filed 11-10 1965

Allice J. Duck Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
can be served at Farm Bureau
Insurance Company, So. Section
Street, Fairhope, Ala.

RECEIVED
Received In Office

NOV 10 1965 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this Nov-15 1965
by leaving a copy with

Samuel Wayne Floyd

Sheriff claims 70 miles or

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY RP DEPUTY SHERIFF

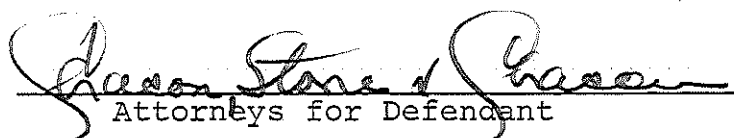
Taylor Wilkins Sheriff
Roly Randall Deputy Sheriff

Fi Lopez

WILLIAM LEROY PATTON, JR., X
 X Plaintiff, X IN THE CIRCUIT COURT OF
 X vs. X BALDWIN COUNTY, ALABAMA
SAMUEL WAYNE FLOYD, X LAW SIDE NO. 6757
 X Defendant. X

Comes the Defendant in the above styled cause and for plea to the Complaint filed in said cause, separately and severally, says:

1. Not guilty.
2. That at the time and place claimed of in the Complaint the Plaintiff himself was guilty of negligence which was the proximate cause of his injuries and damages, hence he cannot recover in this suit.
3. The Defendant, by way of recoupment, claims of the Plaintiff the sum of Eight Hundred Dollars (\$800.00) as damages for that heretofore, on to-wit, September 29, 1965, the Plaintiff negligently drove a motor vehicle into or against a motor vehicle owned by the Defendant at the intersection of Church Street and Fairhope Avenue in the City of Fairhope, Baldwin County, Alabama, and as a proximate result of the negligence of such Plaintiff the Defendant's automobile was damaged in this: his left front fender was damaged and bent, the front bumper was seriously damaged, the grill and radiator were damaged, the hood was bent, the air conditioning unit was damaged and the car was otherwise bent and damaged, all to the damage of the Defendant in the sum above mentioned.


Attorneys for Defendant

FILED

NOV 24 1965

ALICE L. DICK, CLERK
REGISTER

344

6757

WILLIAM LEROY PATTON, JR.,

Plaintiff,

vs.

SAMUEL WAYNE FLOYD,

Defendant.

PLEAS

FILED
NOV 24 1965
ALICE J. DUCK, CLERK
REGISTER

WILLIAM LEROY PATTON, JR.)

Plaintiff,)

vs.)

SAMUEL WAYNE FLOYD,)

Defendant.)

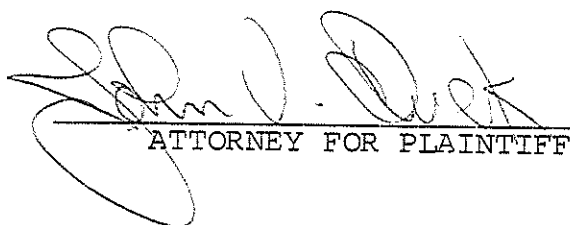
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 6757


Comes now Plaintiff in the above styled cause, and for plea to the Plea of Recoupment filed herein, says:

"NOT GUILTY".


ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 10th day of January, 1966
 Plaintiff
Attorney for

FILED
JAN 18 1966
ALICE L. DUCK, CLERK
REGISTER