

ANNE T. NIX, )  
Plaintiff, )  
vs. )  
ERNESTINE M. FEATHERS, )  
Defendant. )

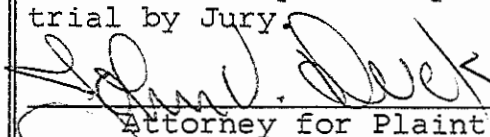
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW 6509

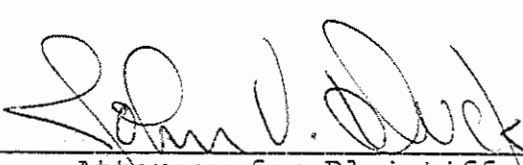
COUNT ONE

The Plaintiff claims of the Defendant the sum of SEVEN THOUSAND FIVE HUNDRED AND NO/100 (\$7,500.00) DOLLARS as damages for that heretofore and on, to-wit: the 1st day of December, 1964 at 11:40 A.M. the Defendant so negligently operated her motor vehicle on North Section Street at its intersection with Rosa Avenue, which was then and there a public street in Fairhope, Baldwin County, Alabama, as to allow the said automobile of the Defendant's to run into, on or against the automobile of the Plaintiff, and as a direct and proximate result of the negligence of the Defendant as aforesaid, your Plaintiff was injured in that she suffered injuries to her neck, that the cervical muscles were pulled, torn and otherwise injured, that she was caused to expend large sums of money in and about the treatment of her said injuries by the employment of doctors, nurses and X-rays, that she suffered great pain and mental anguish, and that she was permanently injured.

Plaintiff further avers that as a proximate and direct result of the negligence of the Defendant as aforesaid, Plaintiff's car was damaged and the left fender was bent, torn and smashed, the engine compartment lid had to be replaced, the rear bumper assembly was totally destroyed and had to be replaced, that the rear body panel was bent, smashed, torn and otherwise damaged, that the rear engine baffle was destroyed and had to be replaced, and that the Plaintiff's said automobile was otherwise bent, torn and damaged, all as a result of the negligence of the Defendant as aforesaid, hence this suit.

Plaintiff respectfully demands a trial by Jury.

  
Attorney for Plaintiff

  
Attorney for Plaintiff

FILED  
MAY 7 1965  
ALICE L. DUCK, CLERK  
REGISTERED

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6509

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ERNESTINE M. FEATHERS

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.....

ERNESTINE M. FEATHERS....., Defendant.....

by ANNE T. NIX.....  
....., Plaintiff.....

Witness my hand this 7 day of May 1965  
Alice J. Luck..... Clerk

No. 6509

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ANNE T. NIX

Plaintiffs

vs.

ERNESTINE M. FEATHERS

Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

MAY 3 1965 Clerk

ALICE A. DUCK, CLERK  
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Colonial Acres  
Fairhope, Alabama

Received In Office

May 7 1965

....., Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

*Returned by  
order of clerk*

..... Sheriff

..... Deputy Sheriff

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

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

P. O. Box 239

Bay Minette, Ala.

DATE August 3, 1965

Re: Re: Nix vs. Feathers. Civil #6509

Dear Mrs. Duck:

Please dismiss captioned case and send

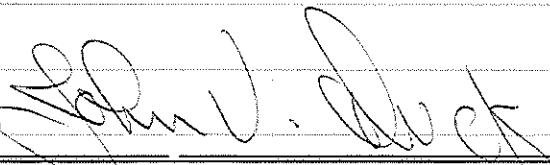
cost bill to Safeco Insurance Company,

P. O. Box 7361, Mobile, Ala. 36603.

Thank you.

Sincerely,

SIGNED



DATE

SIGNED

# SPEED LETTER

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

## MESSAGE

## REPLY

TO Mrs. Alice J. Duck

P. O. Box 239

Bay Minette, Ala.

DATE May 5, 1965

Re: Anne T. Nix vs. Ernestine M. Feathers

Dear Mrs. Duck:

We enclose herewith Bill of Complaint to  
be filed together with copy of same and  
Summons to be served.

Sincerely,

DATE

~~5/6/65~~ 6509  
to Sher

# SPEED LETTER

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

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DATE May 5, 1965

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SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6509

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.....ERNESTINE M. FEATHERS....., Defendant.....

by ANNE T. NIX.....

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

Witness my hand this 7 day of May 1965  
Alice J. Duck Clerk

Page.....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

ANNE T. NIX

## Plaintiffs

vs.

ERNESTINE M. FEATHERS

## Defendants

## SUMMONS AND COMPLAINT

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

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Colonial Acres  
Fairhope, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

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

Sheriff

Deputy Sheriff



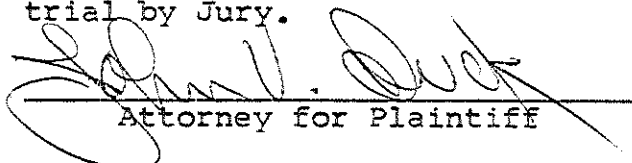
ANNE T. NIX,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW 6509
ERNESTINE M. FEATHERS,	)	
Defendant.	)	


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Attorney for Plaintiff

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ALICE J. DUCK, CLERK  
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