

EDWIN A SHELTON, )  
Plaintiff, )  
-vs- )  
ALFORD MOSLEY and CLAUDE )  
JUNIOR MIMS, jointly and )  
individually, )  
Defendants. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

728 6516

Plaintiff claims of the Defendant the sum of TWENTY-FIVE THOUSAND AND NO/100 (\$25,000.00) DOLLARS as damages for that Plaintiff avers that on, to-wit: the 19th day of January, 1965, Plaintiff's minor daughter was riding in a motor vehicle on a public street in the Town of Robertsdale, County of Baldwin, State of Alabama, on Milwaukee Street at its intersection with Spaceway Shopping Center, which was then and there a public highway in Baldwin County, Alabama, and on said day and date, at said time and place, the Defendant, CLAUDE JUNIOR MIMS, as agent, servant or employee of ALFORD MOSLEY, while acting within the line and scope of his employment, so negligently operated a motor vehicle as to allow it to run into, upon or against the motor vehicle in which Plaintiff's said minor daughter was riding, and by reason thereof and as the proximate result and consequence thereof, Plaintiff's minor daughter was injured in this, to-wit: she suffered a complete fracture of her mandible just to the right of the midline. She suffered multiple contusions and abrasions, she suffered and continues to suffer a mental and physical pain; she was hospitalized and confined to her bed and remained there for several days, all as a result of the negligence aforesaid.

And Plaintiff avers that as the result and consequence of said injuries sustained by his said minor daughter, he was put to the expense of doctor bills, hospital expenses; he was forced to lose the services of and companionship of his said minor daughter; for all of which he claims damages as aforesaid.

Plaintiff respectfully demands a Trial by Jury.

Attorney for Plaintiff

Attorney for Plaintiff

304

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 Comanded to Summon ALFORD MOSLEY and CLAUDE JUNIOR MIMS,  
jointly and individually,

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.....  
ALFORD MOSLEY and CLAUDE JUNIOR MIMS, jointly & individ- ually,  
Defendant..S.

by EDWIN A. SHELDON

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

Witness my hand this 14 day of May 1965

EX-5-28-65

Theresa J. French, Clerk

No. 6514

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

EDWIN A. SHELDON,

Plaintiffs

vs.

ALFORD MOSLEY and CLAUDE  
JUNIOR MIMS, jointly and  
individually,

Defendants

SUMMONS AND COMPLAINT

Filed 5-14 1965

Alfred J. Duck Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Both Defendants live in

Loxley, Alabama

RECEIVED  
Received In Office

MAY 14 1965 19.....

TAYLOR WILKINS

SHERIFF

I have executed this summons

this 2nd day 1965

by leaving a copy with

Alfred Mosley  
Claude Junior Mims

Sheriff claims 100

Ton County per mile Total \$ 100.00 miles at

TAYLOR WILKINS, Sheriff

BY

Charles  
DEPUTY SHERIFF

John V. Duck Sheriff  
Robert D. Duck Deputy Sheriff

R. Duck

P.O. Box Y

JOHN V. DUCK

ATTORNEY AT LAW

FAIRHOPE, ALABAMA

October 4, 1965

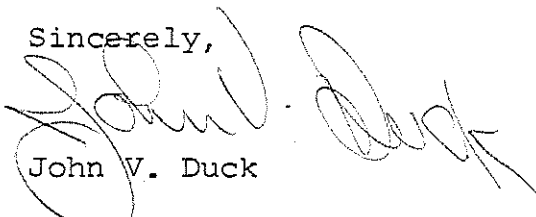
Mrs. Alice J. Duck  
P. O. Box 239  
Bay Minette, Ala.

Re: Sheldon vs. Mosley

Dear Mrs. Duck:

Would you please request the Judge to enter a Judgment for \$100.00 in the minor's case in the above styled cause, and in Mr. Sheldon's case request the Judge to enter ~~settled between parties and send the cost bills~~ to Armbrecht, Jackson, McConnell & DeMouy, Attention Mr. Broox Holmes, Merchants National Bank Building, Mobile, Alabama.

Sincerely,

  
John V. Duck

JVD:lh

ARMBRECHT, JACKSON & DEMOUY  
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

AREA CODE 205  
PHONE 433-1891

CABLE ADDRESS  
SEALAW

WM. H. ARMBRECHT  
THEODORE K. JACKSON  
MARSHALL J. DEMOUY  
WM. H. ARMBRECHT, III  
RAE M. CROWE  
BROOX G. HOLMES  
W. BOYD REEVES  
JOHN GROW  
LOUIS H. ANDERS, JR.  
FRANK B. MCRIGHT

September 8, 1965

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

Re: Theresa Lynn Sheldon, a Minor, etc.  
vs. Alford Mosley, et al  
At Law - Case No. \_\_\_\_\_

Dear Mrs. Duck:

Enclosed please find Plea which we wish to file on behalf  
of the Defendants in the above captioned case. We have mailed a copy to  
John V. Duck, Esq., Attorney for the Plaintiff.

Very truly yours,

ARMBRECHT, JACKSON, & DeMOUY

By: Broox G. Holmes  
BROOX G. HOLMES

BGH:bp  
Encl.

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 May 13, 1965

Re: EDWIN A. SHELDON vs. MOSLEY & MIMS

Dear Mrs. Duck:

Enclosed you will find a Bill of Complaint to be filed in above case, together with two copies of same and Summons to be served.

Sincerely,

DATE

SIGNED

SIGNED