

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 June 24, 1965

Re: Kenneth R. Taylor vs. Leroy Hill

Dear Mrs. Duck:

We enclose herewith Bill of Complaint to be filed in captioned case together with copy of same and Summone to be lerved.

Sincerely,

SIGNED

DATE

SIGNED

DUCK & LACEY

Attorneys at Law

P. O. DRAWER 201- FAIRHOPE, ALABAMA

MESSAGE

REPLY

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

DATE August 16, 1965

Re: Taylor vs. Hill, Civil Case 6571

Dear Mrs. Duck:

We sent this Complaint up for filing on June 24, 1965 but have never received notice that Leroy Hill was served. He works for International Paper Company in Mobile and I would appreciate it if you would see if he could be served there.

Sincerely,

SIGNED

DATE

8-18-65

No Service to date.

Your message has been relayed to the Sheriff's office

A. J. W.

SIGNED

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 Summon LEROY HILL

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.....

LEROY HILL

....., Defendant.....

by KENNETH R. TAYLOR

..... Plaintiff.....

Witness my hand this 28 day of June 19 65

[Signature]

Clerk

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

KENNETH R. TAYLOR

Plaintiffs

vs.

TEROY HILL

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

KENNETH R. TAYLOR,)
Plaintiff,)
vs.)
LEROY HILL,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Plaintiff claims of the Defendant the sum of SEVEN THOUSAND FIVE HUNDRED (\$7,500.00) DOLLARS as damages, for that, therefore on, to-wit: the 19th day of April, 1965, Plaintiff was operating his motor vehicle on a public highway No. U. S. 90 at the east end of the Tensaw River Bridge, which was then and there a public highway in Baldwin County, Alabama, where he had a right to be, and the Defendant so negligently operated a motor vehicle then and there, as to cause said motor vehicle to run into, upon or against the automobile of the Plaintiff, and Plaintiff avers that as a proximate consequence thereof, he was injured in that he suffered a cervical strain of his neck muscles, that he suffered ligamentous tears of the cervical neck muscles, that he suffered contusions and abrasions, and that he was otherwise made sick, lame and sore, that he was forced to lose time from his employment, all as a result of the negligence of the Defendant as aforesaid.

Plaintiff further avers that as a proximate result of the Defendant, that the said Plaintiff's automobile was bent, torn and smashed, that the left rear tail pipe was completely destroyed, that the left rear tail, lower and upper panel was bent, torn and smashed, that the rear bumper was completely destroyed, that the rear deck lid was bent, smashed and otherwise torn, all as a result of the negligence of the Defendant, hence this suit.


ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands
a Trial by Jury.


Attorney for Plaintiff

6-28-65

MADE L. BUCK, CLERK
REGISTER

KENNETH R. TAYLOR,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
LEROY HILL,)	<i>Mr. 6571</i>
Defendant.)	

Plaintiff claims of the Defendant the sum of SEVEN THOUSAND FIVE HUNDRED (\$7,500.00) DOLLARS as damages, for that, heretofore on, to-wit: the 19th day of April, 1965, Plaintiff was operating his motor vehicle on a public highway No. U. S. 90 at the east end of the Tensaw River Bridge, which was then and there a public highway in Baldwin County, Alabama, where he had a right to be, and the Defendant so negligently operated a motor vehicle then and there, as to cause said motor vehicle to run into, upon or against the automobile of the Plaintiff, and Plaintiff avers that as a proximate consequence thereof, he was injured in that he suffered a cervical strain of his neck muscles, that he suffered ligamentous tears of the cervical neck muscles, that he suffered contusions and abrasions, and that he was otherwise made sick, lame and sore, that he was forced to lose time from his employment, all as a result of the negligence of the Defendant as aforesaid.

Plaintiff further avers that as a proximate result of the Defendant, that the said Plaintiff's automobile was bent, torn and smashed, that the left rear tail pipe was completely destroyed, that the left rear tail, lower and upper panel was bent, torn and smashed, that the rear bumper was completely destroyed, that the rear deck lid was bent, smashed and otherwise torn, all as a result of the negligence of the Defendant, hence this suit.

John V. Dock
 ATTORNEY FOR PLAINTIFF

Plaintiff respectfully demands

a Trial by Jury.

John V. Dock
 Attorney for Plaintiff

FILED
 JUN 22
 1965
 CLERK
 REGISTER

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 Summon LEROY HILL

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.....

LEROY HILL

....., Defendant.....

by KENNETH R. TAYLOR

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

Witness my hand this.....24.....day of.....June.....1965.....

N.F.

Chief Clerk

....., Clerk

No 6571

5008

No. 6571

Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

KENNETH R. TAYLOR

Plaintiffs

vs.

✓ LEROY HILL

Defendants

SUMMONS AND COMPLAINT

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

FILED

AUG 20 1965

Clerk

REC'D. SHERIFF'S OFFICE
BALDWIN COUNTY, ALA.
AUG 30 8 44 AM '65

BY

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received In Office

June 28 1965

1965

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Returned 27 day of Aug 1965
Not found in my county after diligent search and
inquiry.

Taylor Wilkins Sheriff

By Roy Randall Deputy Sheriff

RETURNED 9-2-65
Not found in my county after dil-
igent search and inquiry.

RAY D. BRIDGES, Sheriff

By B. Smith D.E. Sheriff

Deputy Sheriff