

2193

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
Bay Minette, Ala.

DATE July 2, 1965

Re: Fahy Store vs. Walter Joe Morris

Dear Mrs. Duck:

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

Sincerely,

SIGNED

John V. Duck

DATE

SIGNED

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA
BALDWIN COUNTY

No. 6542

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WALTER JOE MORRIS

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.....

WALTER JOE MORRIS....., Defendant.....

by THE FAHY STORE, INC......

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

Witness my hand this.....day of..... 19.....

....., Clerk

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

THE FAHY STORE, INC.

Plaintiffs

vs.

WALTER JOE MORRIS

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1
Summerdale, Alabama

Received In Office

..... 19.....

..... Sheriff

I have executed this summons

this 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

THE FAHY STORE, INC,)
 Plaintiff,)
vs.)
WALTER JOE MORRIS,)
 Defendant.)

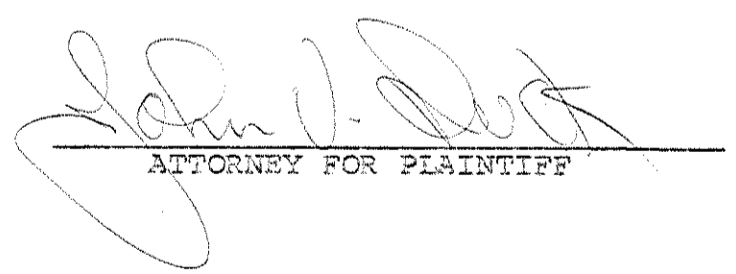
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Plaintiff claims of the Defendant the sum of, to-wit:
ONE HUNDRED THIRTY-FIVE AND 71/100 (\$135.71) DOLLARS with interest
thereon from the 13th day of January, 1965, for that on said date
Plaintiff recovered a Judgment against the Defendant before R. M.
RICE, Justice of the Peace in and for Floyd County, Georgia in the
sum of ONE HUNDRED TWENTY-FOUR and 46/100 (\$124.46) DOLLARS on an
open account, and also for his costs in that behalf as appears more
fully on the records of said Court.

Plaintiff avers that the Judgment above noted was had
and obtained on the said open account and that the said R. M. RICE,
acting as such Justice of the Peace in and for Floyd County, Georgia,
was authorized by the laws of said state to make and enter such
judgment in said cause.

Plaintiff further avers that said Judgment remains in
full force and effect and has not been reversed, satisfied or
vacated.

FILED
JAN 20 1965
BALDWIN COUNTY, ALA.


ATTORNEY FOR PLAINTIFF

THE FAHY STORE, INC,)
 Plaintiff,)
 vs.)
 WALTER JOE MORRIS,)
 Defendant.)

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA
 AT LAW

Plaintiff claims of the Defendant the sum of, to-wit:
 ONE HUNDRED THIRTY-FIVE AND 71/100 (\$135.71) DOLLARS with interest
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 full force and effect and has not been reversed, satisfied or
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FILED
 JUL 6 1965
 ALBANY, ALA.

John V. Duck
 ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.

.....TERM. 19.....

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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.....

WALTER JOE MORRIS....., Defendant.....

by THE FAHY STORE, INC......

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

Witness my hand this..... day of..... 19.....

N.F.

Walter J. Morris....., Clerk

No. 6582

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

THE FAHY STORE, INC.

Plaintiffs

vs.

WALTER JOE MORRIS

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Better
Not for Better Address
Not served in S. D. Dole
Defendant lives at

Route 1

Summerdale, Alabama

RECEIVED
Received In Office

JUL 6 1965 19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Returned 19 day of July 1965
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

By Carlisle Childers
Deputy Sheriff

..... Sheriff

..... Deputy Sheriff

AMOS A. BEASLEY,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
JOHN CARLTON KENDRICK)	
Defendant.)	

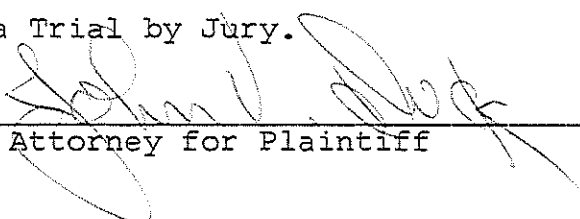
COUNT ONE

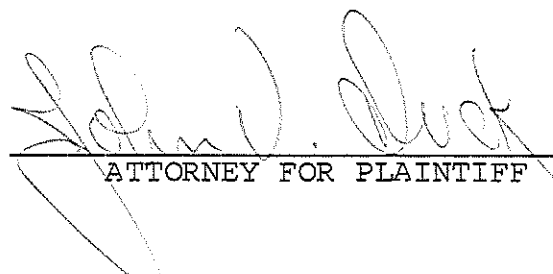
Plaintiff claims of the Defendant the sum of TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) DOLLARS as damages, for that, on, to-wit: the 26th day of September, 1964, at 2:50 P. M., the Defendant so negligently operated a motor vehicle as to allow it to run into, upon or against the vehicle of the Plaintiff on Alabama Highway No. 87, at a point thereon five (5) miles north of its intersection of Elberta, Alabama, which was then and there a public highway in Baldwin County, Alabama, and where said Plaintiff had a right to be, and a direct and proximate result of the negligence of the Defendant as aforesaid, Plaintiff suffered injuries in that he suffered contusions of the left chest, abrasions of the left elbow, and abrasions of the right and left lower legs and knees.

Plaintiff further avers that as a direct and proximate result of the negligence of the Defendant, Plaintiff was caused to spend money in and about the treatment of his injuries, by the payment to doctors for X-rays and other expenses.

Plaintiff further avers that as a direct and proximate cause of the negligence of the Defendant as aforesaid, Plaintiff's said automobile was rendered a total loss, all as a result and direct and proximate cause of the negligence of the Defendant, hence Plaintiff sues.

Plaintiff respectfully demands
a Trial by Jury.


Attorney for Plaintiff


ATTORNEY FOR PLAINTIFF



JUL 6 1965

JOHN I. DUCK, Clerk