

ARMBRECHT, JACKSON & DEMOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

AREA CODE 205
PHONE 432-6751

CABLE ADDRESS
SEALAW

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

April 29, 1966

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

Re: Charles F. Langley vs.
Frank Mayes and James Jackson
No. 6803

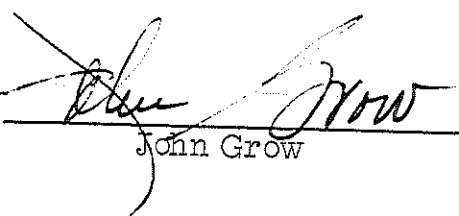
Dear Mrs. Duck:

Enclosed please find Pleas on the above captioned which we would appreciate your filing on behalf of the Defendants. Thanking you for your attention in this matter, we remain

Yours very truly,

ARMBRECHT, JACKSON & DeMOUY

BY


John Grow

JG/bm

Enclosure

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Frank Mayes and James Jackson to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Charles F. Langley.

Witness my hand this 22nd day of December, 1965.

Alice J. Luck
Clerk

CHARLES F. LANGLEY,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
FRANK MAYES and JAMES JACKSON,	X	AT LAW
Defendants.	X	6803

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Seven Hundred Fifty Dollars (\$750.00) as damages, for that on, to-wit: December 28, 1964, at the Blakeley River Bridge on U. S. Highway 90, a public highway in Baldwin County, Alabama, the Defendant Frank Mayes, acting by and through his agent, servant or employee James Jackson, who was then and there acting within the line and scope of his employment, negligently drove a motor vehicle into or against an automobile owned by the Plaintiff and

as a proximate consequence of the negligence of such Defendants
the automobile owned by the Plaintiff was totally wrecked and
destroyed, all to the damage of the Plaintiff in the sum above
mentioned, hence this suit.

Sherry Stone & Luron
Attorneys for Plaintiff

SUMMONS AND COMPLAINT

Defendants address is 802 Whiting Street, Plateau, Alabama.

Defendants.

JAMES JACKSON
FRANK MAYLES and

vs.

Plaintiff.

FILED

DEC 22 1965

ALICE J. DICK, CLERK
REGISTER

CHARLES E. TANGLEY

hm

CHARLES F. LANGLEY,

Plaintiff,

vs.

FRANK MAYES and
JAMES JACKSON,

Defendants.

802 Whiting

SUMMONS AND COMPLAINT

defendants, hence this suit.
defended, all to the damage of the plaintiff in the sum above
the sum of \$1000.00 and in the plaintiff was forced to pay and
as a proximate consequence of the negligence of each defendant

*Received for Plaintiff
Charles F. Langley
\$1000.00
J. W. Langley*

FILED
OCT 1 1932
COURT
CLERK

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Frank Mayes and James Jackson to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Charles F. Langley.

Witness my hand this 22nd day of December

1965.


Alice J. Luck
Clerk

CHARLES F. LANGLEY,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
FRANK MAYES and JAMES JACKSON,	X	AT LAW
Defendants.	X	6803

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Seven Hundred Fifty Dollars (\$750.00) as damages, for that on, to-wit: December 28, 1964, at the Blakeley River Bridge on U. S. Highway 90, a public highway in Baldwin County, Alabama, the Defendant Frank Mayes, acting by and through his agent, servant or employee James Jackson, who was then and there acting within the line and scope of his employment, negligently drove a motor vehicle into or against an automobile owned by the Plaintiff and

as a proximate consequence of the negligence of such Defendants the automobile owned by the Plaintiff was totally wrecked and destroyed, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.


Attorneys for Plaintiff

Defendants' address is 802 Whiting Street, Plateau, Alabama.

FILED
DEC 22 1965
ALICE L. DUK, CLERK
REGISTER

2-18-66 - Mayes

F. Jackson

Returned 18 day of March 1966
Not found in my county after diligent search and in-
quiry. as to James Jackson

Taylor Wilkins, Sheriff

By Taylor Wilkins
Deputy Sheriff

Received 22 day of Dec 1965

and on 18th day of March 1966

served a copy of the within At

to Frank Mayes

[Signature]

by service on [Signature]

TAYLOR WILKINS, Sheriff

By Taylor Wilkins

omi

~~RETURNED 2-9-66~~

~~Not found in my County after dil-~~

~~igent search and inquiry.~~

~~RAY D. BRIDGES, Sheriff~~

~~By [Signature]~~

6803 5219
CHARLES F. LANGLEY,

Plaintiff,

vs.

FRANK MAYES and
JAMES JACKSON. -N.F.

SUMMONS AND COMPLAINT

FILED

DEC 22 1965

ALICE J. BRYCE CLERK
REGISTER

DEC 28 10 44 AM '65

REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.

Chason, Stone & Chason

CHARLES F. LANGLEY

Plaintiff,

-VS-

FRANK MAYES and JAMES
JACKSON,

Defendants.

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, ALABAMA
*
* AT LAW
*
*
*
*
* NO. 6803

PLEAS

Comes now the Defendants in the above styled cause, separately and severally, and for answer to the Complaint and to each and every count thereof, separately and severally, files the following separate and several pleas:

1. Not Guilty.

2. For that on the occasion complained of in Plaintiff's Complaint, the Plaintiff so negligently operated its said motor vehicle on U. S. Highway 90 at the Blakeley River Bridge, said highway being a public highway in Baldwin County, Alabama, as to cause or allow his said motor vehicle to collide with the said automobile of the Defendant, and Defendant says that Plaintiff's said negligence proximately contributed to Plaintiff's said injuries and damages; hence, the Plaintiff cannot recover in this suit.

ARMBRECHT, JACKSON & DeMOUY


BY


JOHN GROW

CERTIFICATE OF SERVICE

I, John Grow, do hereby certify that I have served a copy of the foregoing Pleas on John Chason, Esquire, Attorney for the Plaintiff, by mailing the same, by United States Mail, first class postage prepaid, to his address at Bay Minette, Alabama

FILED
May 1 1966
ALICE J. DOWK, CLERK
REGISTER


John Grow