

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 C. P. Yarborough and Max Dee Sasnett 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 Essie E. Davison.

Witness my hand this 6 day of April, 1966.

Alice J. Murch
Clerk

ESSIE E. DAVISON,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

C. P. YARBOROUGH and
MAX DEE SASNETT,

X

LAW SIDE

Defendants.

X

No. 6927

X

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on, to-wit: December 14, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.8 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant,

C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sasnett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants' vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: Her neck and back were seriously injured, she was bruised and made sore, she was caused to suffer severe pain and mental anguish and still suffers such pain and anguish, she was caused to incur large medical and hospital expenses and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.


COUNT TWO:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that on, to-wit: December 14, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.8 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant, C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sasnett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants'

vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: Her motor vehicle was almost completely demolished, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.


Attorneys for Plaintiff

Plaintiff demands a trial of
this cause by a jury.


Attorneys for Plaintiff

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Chason, one of the Attorneys of record for the Plaintiff in the above styled cause and who, after being by me first duly and legally sworn did depose and say under oath as follows:

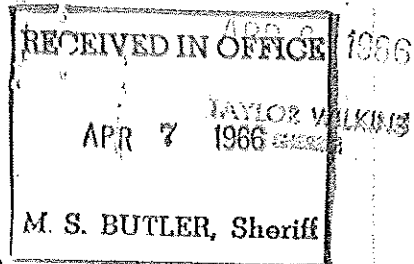
That his name is John Chason and he is one of the Attorneys of record for the Plaintiff in the above styled cause. According to his knowledge, information and belief the Defendants are both over the age of twenty-one years; the Defendant, C. P. Yarborough, is a non-resident of the State of Alabama, his post office address being Westville, Florida, and that Max Dee Sasnett is a non-resident of the State of Alabama, his post office address being Route 2, Westville, Florida.

Sworn to and subscribed before me
this 6th day of April, 1966.


Notary Public, Baldwin County, Alabama

RECEIVED

NO. 6927



ESSIE E. DAVISON,
Plaintiff,

vs.

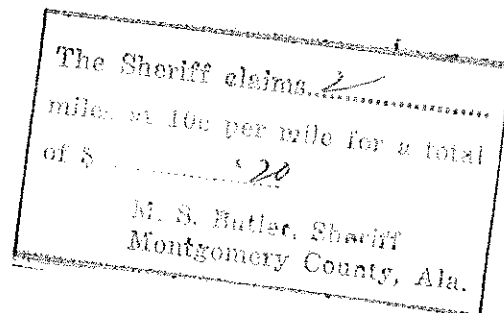
C. P. YARBOROUGH and
MAX DEE SASNETT,
Defendants.

Executed by serving 6 copies of
the within on C. P. Yarbrough
Secretary of State of The State of
Alabama.

This the 8 day of April 1966

Sheriff of Montgomery County
M. S. Butler,

By J. H. Butler D. S.



SUMMONS AND COMPLAINT

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

In the Matter of the Removal to the
District Court of the United States
for the Southern District of Alabama,
Southern Division, of the case of:

ESSIE E. DAVISON,

Plaintiff,

VS.

C. P. YARBOROUGH and MAX DEE SASNETT,

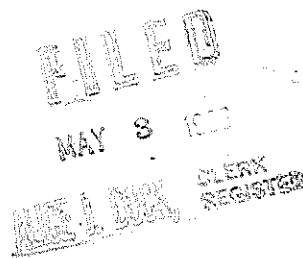
Defendants.

TO: Mrs. Alice J. Duck,
Clerk, Circuit Court of Baldwin
County, Alabama

Pursuant to the provisions of law in such cases made
and provided, there is hereby filed with you a copy of the
petition of the defendants, C. P. Yarborough and Max Dee
Sasnett

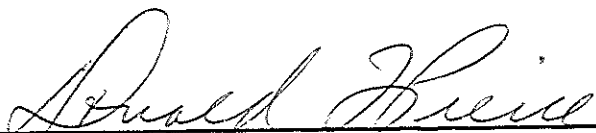
in the above entitled cause to remove said cause to the
United States District Court for the Southern Division of
the Southern District of Alabama. The said petition,
accompanied by a bond with good and sufficient surety con-
ditioned as is required by law, has been this day filed in
the said United States District Court for the Southern
Division of the Southern District of Alabama.

Written notice of the filing of the aforesaid petition
and bond has been this day mailed to the attorney for the
plaintiff herein, and you are hereby notified that the filing
of a copy of the aforesaid petition with you as Clerk of the
Circuit Court of Baldwin County, Alabama, effects the



removal of said cause to the aforesaid District Court of
the United States.

DATED this 2nd day of May, 19 66.



Attorney for Defendants, C. P.
Yarborough and Max Dee Sasnett
622 First National Bank Building
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

ESSIE E. DAVISON,

:

Plaintiff

:

vs.

:

CIVIL ACTION NO. _____

C. P. YARBOROUGH and MAX
DEE SASNETT,

:

:

Defendants.

:

PETITION OF DEFENDANTS FOR REMOVAL TO
UNITED STATES DISTRICT COURT

Comes now each of your Petitioners, C. P. Yarborough
and Max Dee Sasnett, separately, defendants in the above-
styled cause, and shows unto the Court as follows:

1. That the defendant, C. P. Yarborough, is now and
was at the time of the commencement of this suit a resident
citizen of the State of Florida; that the defendant Max Dee
Sasnett, is now and was at the time of the commencement of
this suit a resident citizen of the State of Florida; that
the plaintiff, Essie E. Davison, is now and was at the time
of the commencement of this suit a resident citizen of the
State of Alabama; that this is an action brought by a citizen
of the State of Alabama against citizens of the State of
Florida and is one wholly between citizens of different
states, and one which can be fully determined between them.

2. That this is a suit for the recovery of the sum of \$15,000.00 as damages, from the defendants, same being the amount claimed by the plaintiff in the suit filed in the Circuit Court of Baldwin County, Alabama, At Law, being Case Number 6927 on the docket of said Court and which suit is for the alleged negligence of the defendants.

3. That the amount sued for and involved in this action exceeds the sum of \$10,000.00, exclusive of interest and costs; that the defendants, C. P. Yarborough and Max Dee Sasnett have filed no pleadings in the Circuit Court of Baldwin County, Alabama, in said cause; that less than thirty (30) days have expired since said defendants were purportedly served with the complaint in this cause; that said defendants therefore file this Petition for Removal within the time allowed by law; and that the said defendants have a good defense to said cause. Said defendants attach hereto as Exhibit "A" and make a part hereof, copies of all process and pleadings purported to have been served in said Circuit Court action.

4. Petitioners desire to remove this action to this Court on the grounds of diversity of citizenship existing between the plaintiff and the defendants, pursuant to the Acts of Congress in that behalf provided. Petitioners therefore file and offer herewith bond with good and sufficient surety in the penal sum of FIVE HUNDRED AND NO/100 DOLLARS

(\$500.00) conditioned that the defendants will pay all costs and disbursements incurred by reason of this removal proceeding, should it be determined that this action was wrongfully or improperly removed to this said court.

5. Petitioners represent that promptly upon the filing of this Petition and the bond filed herewith, petitioners shall give written notice thereof to the adverse party and shall file a copy of the Petition with the Clerk of the Circuit Court of Baldwin County, Alabama, wherein said action is now pending.

WHEREFORE, your Petitioners pray that the said bond filed herewith be accepted as good and sufficient and that this Court will enter such order as may be proper in the premises.

DATED this 2nd day of May, 1966.

Donald F. Pierce
Attorney for Defendants C. P.
Yarborough and Max Dee Sasnett

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

STATE OF ALABAMA:
COUNTY OF MOBILE:

Donald F. Pierce, first being duly sworn, deposes and says that he is a member of the law firm of Hand, Arendall, Bedsole, Greaves & Johnston, Attorneys for the Defendants, C. P. Yarborough and Max Dee Sasnett, in the above-styled cause, and is authorized to execute this affidavit in behalf of said defendants; that he has read the foregoing Petition and knows the contents thereof, and that the facts stated therein are true.

Donald F. Pierce
Donald F. Pierce

Subscribed and sworn to before me this 2nd day of May, 1966.

Max D. Sasnett
Notary Public, Mobile County, Alabama



STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY 4, ALABAMA

April 8, 1966

MRS. AGNES BAGGETT
SECRETARY OF STATE

C. P. Yarborough
Westville,
Fla.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
DELIVER TO ADDRESSEE ONLY

You will take notice that on April 8, 1966 the Sheriff of
Montgomery County, Alabama, served upon me, in my official capacity, Summons and Com-
plaint in a case entitled: ESSIE E. DAVISON,

Plaintiff VS C. P. YARBOROUGH, et al,

Defendants in the CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA LAW SIDE

Case No. 6927 true copy of which Summons and Complaint is attached hereto and
the said service upon me as Secretary of State of the State of Alabama has the force and effect
of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 8
day of April 1966

Mrs. Agnes Baggett
Mrs. Agnes Baggett
Secretary of State

Enclosure : Copy of Summons and Complaint
cc: Hon. John Chason
Chason, Stone & Chason
Bay Minette, Ala.

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. P. Yarborough and Max Dee Sasnett 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 Essie E. Davison.

Witness my hand this 6 day of April, 1966.

Alvin J. Alueh
Clerk

ESSIE E. DAVISON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
VS.	X	BALDWIN COUNTY, ALABAMA
C. P. YARBOROUGH and	X	LAW SIDE
MAX DEE SASNETT,	X	
Defendants.	X	No. 6927
	X	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on, to-wit: December 14, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.8 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant,

C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sasnett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants' vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: Her neck and back were seriously injured, she was bruised and made sore, she was caused to suffer severe pain and mental anguish and still suffers such pain and anguish, she was caused to incur large medical and hospital expenses and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that on, to-wit: December 14, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.8 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant, C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sasnett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants'

vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: Her motor vehicle was almost completely demolished, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

James H. Dugan
Attorneys for Plaintiff

Plaintiff demands a trial of
this cause by a jury.

James H. Dugan
Attorneys for Plaintiff

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Chason, one of the Attorneys of record for the Plaintiff in the above styled cause and who, after being by me first duly and legally sworn did depose and say under oath as follows:

That his name is John Chason and he is one of the Attorneys of record for the Plaintiff in the above styled cause. According to his knowledge, information and belief the Defendants are both over the age of twenty-one years; the Defendant, C. P. Yarborough, is a non-resident of the State of Alabama, his post office address being Westville, Florida, and that Max Dee Sasnett is a non-resident of the State of Alabama, his post office address being Route 2, Westville, Florida.

John Chason

Sworn to and subscribed before me
this 6th day of April, 1966.

Marie B. Bryars
Notary Public, Baldwin County, Alabama

April 27, 1966

ESSIE E. DAVISON, Plaintiff
VS
C. P. YARBOROUGH, et al, Defendants

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA LAW SIDE

CASE NO. 6927

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE:

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on April 8, 1966
I sent by certified mail in an envelope addressed as follows:

"

C. P. Yarborough
Westville,
Fla."

"Certified Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of
the State of Alabama in words and figures as follows:

"

C. P. Yarborough
Westville,
Fla.

You will take notice that on April 8, 1966 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: ESSIE E. DAVISON, Plaintiff VS C. P. YARBOROUGH, et al,
Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE
Case No. 6927 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and
effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 8
day of April 1966

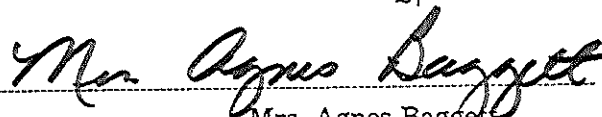
Enclosure (1)

(Signed) Mrs. Agnes Baggett
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed
as above set forth had attached to it a true copy of the summons and complaint in the above-styled
cause.

I further certify that on Apr 22 1966 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Westville, Fl.
on date not given

WITNESS MY HAND and the Great Seal of the State of Alabama this the 27 day
of April 1966


Mrs. Agnes Baggett
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Hon. John Chason
Bay Minette, Ala.

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALEWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. P. Yarborough and Max Dee Sasnett 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 Essie E. Davison.

Witness my hand this 6 day of April, 1966.

Alice J. Welch
Clerk

ESSIE E. DAVISON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
C. P. YARBOROUGH and	X	LAW SIDE
MAX DEE SASNETT,	X	
Defendants.	X	No. 6927
	X	

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on, to-wit: December 14, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.8 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant,

C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sasnett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants' vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: Her neck and back were seriously injured, she was bruised and made sore, she was caused to suffer severe pain and mental anguish and still suffers such pain and anguish, she was caused to incur large medical and hospital expenses and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that on, to-wit: December 14, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.8 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant, C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sasnett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants'

vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: Her motor vehicle was almost completely demolished, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.


John Chason
Attorneys for Plaintiff


Plaintiff demands a trial of
this cause by a jury.

John Chason
Attorneys for Plaintiff

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Chason, one of the Attorneys of record for the Plaintiff in the above styled cause and who, after being by me first duly and legally sworn did depose and say under oath as follows:

That his name is John Chason and he is one of the Attorneys of record for the Plaintiff in the above styled cause. According to his knowledge, information and belief the Defendants are both over the age of twenty-one years; the Defendant, C. P. Yarborough, is a non-resident of the State of Alabama, his post office address being Westville, Florida, and that Max Dee Sasnett is a non-resident of the State of Alabama, his post office address being Route 2, Westville, Florida.


Sworn to and subscribed before me
this 6th day of April, 1966.

Maria B. Bryane
Notary Public, Baldwin County, Alabama



April 19, 1966

ESSIE E. DAVISON, Plaintiff
VS
MAX DEE SASNETT, et al, Defendants

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA LAW SIDE

CASE NO. 6927

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE:

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on April 8, 1966
I sent by certified mail in an envelope addressed as follows:

" Max Dee Sasnett
Route 2
Westville, Fla."

"Certified Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of
the State of Alabama in words and figures as follows:

" Max Dee Sasnett
Route 2
Westville, Fla."

You will take notice that on April 8, 1966 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: ESSIE E. DAVISON, Plaintiff VS MAX DEE SASNETT, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE
Case No. 6927 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and
effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 8
day of April 1966

Enclosure (1)

(Signed) Mrs. Agnes Baggett
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed
as above set forth had attached to it a true copy of the summons and complaint in the above-styled
cause.

I further certify that on Apr 18 1966 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Westville, Fl.
on 4-16-66

WITNESS MY HAND and the Great Seal of the State of Alabama this the 19 day
of April 1966

Mrs. Agnes Baggett
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Hon. John Chason
Bay Minette, Ala.

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 C. P. Yarborough and Max Dee Sasmatt 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 Essie E. Davison.

Witness my hand this 6 day of April, 1966.

Peri J. Newk
Clerk

ESSIE E. DAVISON,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
C. P. YARBOROUGH and	X	LAW SIDE
MAX DEE SASNETT,	X	706927
Defendants.	X	

COUNT ONE:

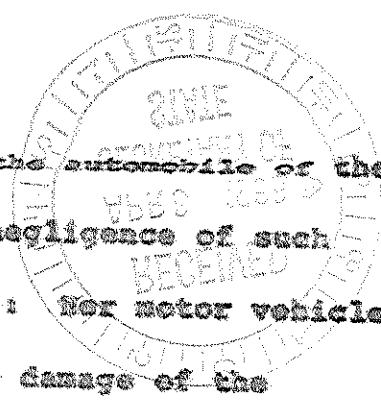
The Plaintiff claims of the Defendants the sum of Fifteen Thousand Dollars (\$15,000.00) as damages for that on, to-wit: December 16, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.8 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant,

C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sannett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants' vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this: Her neck and back were seriously injured, she was bruised and made sore, she was caused to suffer severe pain and mental anguish and still suffers such pain and anguish, she was caused to incur large medical and hospital expenses and she is permanently injured, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendants the sum of One Thousand Dollars (\$1,000.00) as damages for that on, to-wit: December 14, 1965, the Plaintiff was driving her automobile on U. S. Highway 31 at the intersection with Marcell Avenue about 1.5 miles Northeast of the Post Office in Spanish Fort, in Baldwin County, Alabama, and at said time and place the Plaintiff had stopped her automobile in her proper lane of travel and was signaling a left turn, at which time and place the Defendant, C. P. Yarborough, acting by and through his agent, servant or employee, Max Dee Sannett, who was then and there acting within the line and scope of his authority as such agent, servant or employee, negligently blocked the other lane of travel and as a proximate result of the negligence of such Defendants a motor vehicle which was meeting both the Plaintiff and Defendants'

vehicles was caused to run into or against the automobile of the Plaintiff and as a proximate result of the negligence of such Defendants the Plaintiff was injured in this. Her motor vehicle was almost completely demolished, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.


James H. Stone, Esq.
Attorneys for Plaintiff

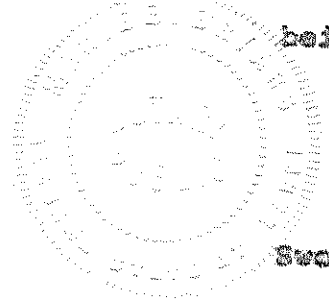
Plaintiff demands a trial of
this cause by a jury.

James H. Stone, Esq.
Attorneys for Plaintiff

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Chason, one of the Attorneys of record for the Plaintiff in the above styled cause and who, after being by me first duly and legally sworn did depose and say under oath as follows:

That his name is John Chason and he is one of the Attorneys of record for the Plaintiff in the above styled cause. According to his knowledge, information and belief the Defendants are both over the age of twenty-one years; the Defendant, C. P. Yarborough, is a non-resident of the State of Alabama, his post office address being Westville, Florida, and that Max Dee Sasmatt is a non-resident of the State of Alabama, his post office address being Route 2, Westville, Florida.


W. H. Gibson
Sworn to and subscribed before me
this 6th day of April, 1966.

Marie B. Bryars
Notary Public, Baldwin County, Alabama