

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

February 9, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

3959 =

Re: Charles R. Mixon
Vs: Terry and Terry

Dear Mrs. Duck:

Please dismiss the complaint, and send the cost bill directly to Subrogation Department, Calvert Fire Insurance Company, P.O. Box 8072, Crosstown Station, Memphis, Tennessee.

Thank you.

Sincerely,

James A. Brice

Jab;mm

SUMMONS

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

TO ANY SHERIFF OF THE STATE OF ALABAMA-----GREETINGS:

You are hereby commanded to summons Edwin Terry and Mavis F. Terry, to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of Charles R. Mixon.

Witness my hand this 28 day of Aug., 1959.

Louis L. Brice
CLERK

COMPLAINT

CHARLES R. MIXON,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
MAVIS F. TERRY AND EDWIN)
TERRY,)
Defendants.

Plaintiff claims of the defendant the sum of Five Hundred and No/100 Dollars (\$500.00), as damages, for that heretofore, on to-wit: the 11th day of May, 1958, the defendants, Mavis F. Terry and Edwin Terry, so negligently operated a motor vehicle on U. S. Highway 31 in front of Jackson's Service Station near Perdido, Alabama, so as to cause or allow said vehicle to collide with a vehicle which was being operated in a Westerly direction on said Highway by the Plaintiff where he had a right to be, and as a direct and proximate result of the negligence of the Defendants, Mavis F. Terry and Edwin Terry, the Plaintiff's vehicle was greatly damaged and rendered useless; for which Plaintiff claims damages as aforesaid.

James A. Brice
James A. Brice

Richard C. Lacey
Richard C. Lacey

ATTORNEYS FOR PLAINTIFF

Defendant resides at Atmore, Alabama.

SUMMONS

STATE OF ALABAMA) IN THE CIRCUIT COURT OF
COUNTY OF BALDWIN) BALDWIN COUNTY, ALABAMA
AT LAW.

TO ANY SHERIFF OF THE STATE OF ALABAMA-----GREETINGS:

You are hereby commanded to summons Edwin Terry and Mavis F. Terry, to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of Charles R. Nixon.

Witness my hand this 24 day of May, 1959.

James H. Price
CLERK

COMPLAINT

CHARLES R. NIXON,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
MAVIS F. TERRY AND EDWIN)
TERRY,)
Defendants.

Plaintiff claims of the defendant the sum of Five Hundred and No/100 Dollars (\$500.00), as damages, for that heretofore, on to-witt: the 11th day of May, 1958, the defendants, Mavis F. Terry and Edwin Terry, so negligently operated a motor vehicle on U. S. Highway 31 in front of Jackson's Service Station near Perdido, Alabama, so as to cause or allow said vehicle to collide with a vehicle which was being operated in a Westerly direction on said Highway by the Plaintiff where he had a right to be, and as a direct and proximate result of the negligence of the Defendants, Mavis F. Terry and Edwin Terry, the Plaintiff's vehicle was greatly damaged and rendered useless; for which Plaintiff claims damages as aforesaid.

James H. Price
James H. Price
Richard C. Lacey
Richard C. Lacey

ATTORNEYS FOR PLAINTIFF

Defendant resides at Atmore, Alabama.

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SUMMONS

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

TO ANY SHERIFF OF THE STATE OF ALABAMA-----GREETINGS:

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Witness my hand this 26 day of May, 1959.

James A. Brize
CLERK

N.F.

COMPLAINT

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Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
MAVIS F. TERRY AND EDWIN)
TERRY,)
Defendants.

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FILED
1059
8/2/59
JULY 1959
1959
1959

ATTORNEYS FOR PLAINTIFF

James A. Brize
Richard C. Lacey

Defendant resides at Atmore, Alabama.

Received 28 day of Aug 1959
and on day of 19
I served a copy of the within
on Maurice Jerry
Cedardale
By service on

TAYLOR WILKINS, Sheriff
By _____
D. S.

Returned 3 day of Sept 1959
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff
By Address
Deputy Sheriff

3959

Charles R. Nixon
vs.
Maurice Jerry
and
Edwin Jerry

Atmore,

FILED
AUG 20 1959
ANNE L. DUCK, CLERK
REGISTER

LAW OFFICES OF
JAMES A. BRICE
RICHARD C. LACEY
FOLEY, ALABAMA