

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

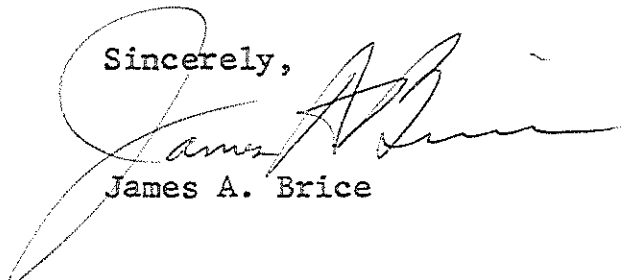
3959
Re: Charles R. Mixon
Vs: Terry and Terry

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.

W. C. Lacey
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.

ATTORNEYS FOR PLAINTIFF

James A. Brice
James A. Brice

Richard C. Lacey
Richard C. Lacey

Defendant resides at Atmore, Alabama.

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. Nixon.

Witness my hand this 24 day of Aug., 1959.

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-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.

ATTORNEYS FOR PLAINTIFF

Defendant resides at Atmore, Alabama.

FILED

Aug 23 1959

CLERK

James A. Brice

Richard C. Lacey

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.


CLERK

-----M.F.-----

COMPLAINT

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

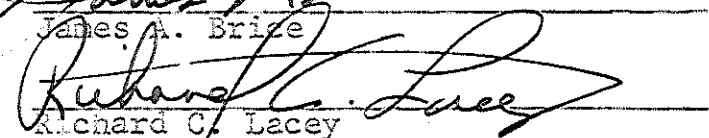
Plaintiff claims of the defendant the sum of Five Hundred and No/100 Dollars (\$500.00), as damages, for that heretofore, on to-wit: the 11th day of May, 1958, the defendants, Mavis F. Terry and Edwin Terry, so negligently operated a motor vehicle on U. S. Highway 31 in front of Jackson's Service Station 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.

FILED

8-28-59

CLERK
J. L. DICK

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 B & C
on Mavis F. Terry
Edwin Terry

By service on _____
TAYLOR WILKINS, Sheriff
By _____ D. S.

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

Taylor Wilkins, Sheriff
By Childress
Deputy Sheriff

3959

Charles R. Myron

vs.

Mavis F. Terry
and
Edwin Terry

Atmore,

FILED

AUG 28 1959

ALICE J. DUCK, CLERK
REGISTER

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