



MARY TEXAS HURT  
SECRETARY OF STATE

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

June 20, 1957

3262

Honorable Harry J. Wilters, Jr.  
Wilters & Brantley, Attorneys  
Bay Minette, Alabama

Re: Drusilla Knight VS R. S. McGown, et al

Dear Mr. Wilters:

Please refer to your file in the above-styled cause and be advised that on June 4, 1957, I sent by registered mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

R. S. McGown  
7765 Opieda Street  
Derby, Colorado

On June 20, 1957, this letter (Registered No. 56762) was returned to me with reason for non-delivery given as "UNCLAIMED."

Will you please advise me as to any further efforts you wish me to make in perfecting this service.

Sincerely yours,

*Mary Texas Hurt Garner*

Mary Texas Hurt Garner  
Secretary of State

*Jamie L. Pettigrew*

By: Jamie L. Pettigrew  
Administrative Assistant

cc: Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama



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June 20, 1957

Honorable Harry J. Wilters, Jr.  
Wilters & Brantley, Attorneys  
Bay Minette,  
Alabama

Re: Drusilla Knight VS Lonnie Arthur Milburn, et al

Dear Mr. Wilters,

Please refer to your file in the above-styled cause and be advised that on June 4, 1957, I sent by registered mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Lonnie Arthur Milburn  
Frontier Hotel  
13 S Curtis Street  
Denver, Colorado

On June 20, 1957, this letter (Registered No. 56763) was returned to me with reason for non-delivery given as "UNKNOWN AT ADDRESS."

Will you please advise me as to any further efforts you wish me to make in perfecting this service.

Sincerely yours,

*Mary Texas Hurt Garner*

Mary Texas Hurt Garner  
Secretary of State

*Jamie L. Pettigrew*

By: Jamie L. Pettigrew  
Administrative Assistant

cc: Honorable Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama

SUMMONS AND COMPLAINT

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon R. S. McGOWN AND LONNIE ARTHUR NILBURN 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 the same, then and there to answer the complaint of Drusilla Knight.

WITNESS my hand this 30 day of May, 1957.

Rebecca H. H. H.  
Clerk

DRUSILLA KNIGHT

PLAINTIFF

VS

R. S. McGOWN AND  
LONNIE ARTHUR NILBURN

DEFENDANTS

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

1.

The plaintiff claims of the Defendants the sum of TWELVE THOUSAND (\$12,000.00) DOLLARS as damages, for that heretofore, on, to-wit, January 21, 1957, the Plaintiff's automobile was being lawfully driven along and upon a public highway in Baldwin County, Alabama, to-wit: U. S. Highway 90, approximately four miles west of the Alabama-Florida State Line and that then and there, Lonnie Arthur Nilburn, a servant, agent, or employer of the Defendant, R. S. McGown, while acting within the line and scope of his employment, negligently did run the motor vehicle he was driving into the Plaintiff's Automobile and as a direct proximate consequent and result of said negligent, the Plaintiff's automobile was damaged as follows: The right rear fender was bent; the quarter panel was bent and twisted; the fuel tank was bent; the hub caps were crushed; the right rear tail-light was broken; the fender molding was twisted; the rear trunk floor was crushed; the rear bumper was bent; the paint on the body was scratched; the frame on the automobile was twisted and bent; the axle housing was twisted and cracked; and the Plaintiff was deprived of the use of her automobile for a long period of time, all to the loss of the Plaintiff.

in the foresaid amount. The Plaintiff's automobile is used in her business, trade, or occupation.

2.

The Plaintiff further avers that the Defendants, R. S. McGown, and Lonnie Arthur Nilburn, were on the date of said collision, to-wit: January 21, 1957, non-residents of the State of Alabama and the present address of the Defendant, R. S. McGown is 7765 Opieda Street, Derby, Colorado, and the present address of Defendant, Lonnie Arthur Nilburn is Frontier Hotel, 13 & Curtis Street, Denver, Colorado, and the Plaintiff prays the service of process upon the Defendants, may be had in accordance with the provisions of the code of Alabama of 1940, Title 7, Section 199.

Wilters & Brantley

BY:

*Gary J. Wilters, Jr.*  
Attorneys for the Plaintiff