

NAOMI F. DEWEY,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA
-vs-	*	AT LAW
BETTY JO SANSPREE,	*	NO. 3279
Defendant.	*	

Comes now the plaintiff in the above styled cause and amends her complaint heretofore filed in said cause by amending, separately and severally, the separate and several COUNT ONE and COUNT TWO to be, separately and severally, as follows:

COUNT ONE

Plaintiff claims of the defendant the sum of, to-wit, Fifty Thousand and No/100 Dollars (\$50,000.00), as damages, for that, heretofore, and on, to-wit, the 4th day of July, 1956, an automobile of the Plaintiff in which the plaintiff was then and there riding was being operated on and along Alabama Highway 89 at a point thereon approximately seven (7) miles southeast of Fairhope, Alabama, said highway being then and there a public highway in Baldwin County, Alabama, and at said time and place the defendant, Betty Jo Sanspree, so negligently operated a motor vehicle on and along said highway as to cause the same to collide with the said automobile of the plaintiff and as a proximate result of the said negligence of the defendant, Betty Jo Sanspree, the said automobile of the plaintiff was smashed and broken, the right front fender, and hood were bent and broken, the frame of said automobile was broken, bent and knocked out of line, the engine and component parts and other mechanisms of said automobile were bent, broken, crushed and otherwise damaged, and the plaintiff suffered serious personal injuries consisting of a tranverse fracture of right femur at the junction of the middle and upper third, an incomplete fracture of the intertrochanteric portion of the right femur, a sprained knee, and a possible lacerated meniscus, she was made nervious and otherwise sick, lame and sore, she was caused

to undergo surgical operations and was confined in a hospital on two different occasions for long periods of time, she was caused to be away from her work for long periods of time and subsequently caused to have to cease working, she was caused to lose and will be caused to continue to lose wages in the future, she suffered and in the future will continue to suffer physical pain and mental anguish and she was permanently injured, and plaintiff incurred and will incur in the future expenses for medical and hospital attention and treatment in connection with said injuries suffered by the plaintiff.

And plaintiff avers that all of the said injuries and damages were the proximate result of the negligence of the defendant, wherefore this suit.

COUNT TWO

The plaintiff claims of the defendant the sum of, to-wit, Fifty Thousand and No/100 Dollars (\$50,000.00), as damages, for that heretofore, on, to-wit, July 4, 1956, an automobile of the plaintiff in which the plaintiff was then and there riding was being operated on and along Alabama Highway 89 at a point approximately seven (7) miles southeast of Fairhope, Alabama, said highway being then and there a public highway in Baldwin County, Alabama, and at said time and place the defendant, Betty Jo Sanspree, willfully or wantonly damaged the plaintiff's said automobile and willfully or wantonly injured the person of the plaintiff by so willfully or wantonly operating a motor vehicle on and along said highway at said time and place, as to cause the same to collide with the plaintiff's automobile in which she was riding at said time and place and as a proximate consequence thereof: the said automobile of the plaintiff was smashed and broken, the right front fender and hood were bent and broken, the frame of said automobile was broken, bent and knocked out of line, the engine and component parts and other mechanisms of said automobile were bent, broken, crushed and

otherwise damaged, and the plaintiff suffered serious personal injuries consisting of a tranverse fracture of the right femur, a sprained knee, and a possible lacerated meniscus, she was made nervous and otherwise sick, lame and sore, she was caused to undergo surgical operations and was confined to the hospital on two different occasions for long periods of time, she was caused to be away from her work for long periods of time and subsequently was caused to have to cease working, she was caused to lose and will be caused to continue to lose wages in the future, she suffered and in the future will continue to suffer physical pain and mental anguish and she was permanently injured, and plaintiff incurred and will incur in the future expenses for medical and hospital attention and treatment in connection with said injuries suffered by the plaintiff.

WHEREFORE, plaintiff claims damages from the defendant in, to-wit, the amount of Fifty Thousand and No/100 Dollars (\$50,000.00) with costs.

McCONNELL & FOREMAN

By *Alison Foreman*
Attorneys for Plaintiff

Copy for:
Chason and Stone, as Guardians
Ad Litem for Betty Jo Sanspree,
a Minor

Copy For:
Chason and Stone
Attorneys for defendant

Filed Aug. 22, 1957
Alice J. Black, Clerk

NAOMI F. DEWEY,	I		
Plaintiff,	I	IN THE CIRCUIT COURT OF	
vs.	I		
	I	BALDWIN COUNTY, ALABAMA	
BETTY JO SANSPREE,	I		
Defendant.	I	AT LAW	NO. 3279
	I		

DEMURRER

Comes now the Defendant, by her attorneys, and demurs to the complaint heretofore filed against her and to each count thereof, separately and severally, and assigns the following separate and several grounds in support thereof:

1. The allegations of the complaint are uncertain in that they fail to allege whether the Plaintiff was operating the automobile in which she was riding or whether she was riding in said automobile as a passenger.

2. For aught that appears from the allegations of the complaint the accident complained of did not happen on a public highway but happened along a public highway.

3. The allegations of the complaint are vague and indefinite in that the Plaintiff alleges that her automobile was being operated "on and along" a highway.

4. The allegations of the complaint are vague and uncertain in that the Plaintiff alleges that the Defendant operated a motor vehicle "on and along" a highway.

5. The allegations of the complaint are inconsistent in that it is therein alleged that the automobiles were being operated "on and along" a highway.

6. The complaint fails to allege a duty owing from the Defendant to the Plaintiff and a breach thereof.

7. The complaint fails to allege that the automobile of the Plaintiff was used in her trade or business.

8. The Plaintiff claims damages for the loss of the use of her automobile but it fails to allege that said automobile was used in her trade or business.

9. The alleged damages of the Plaintiff are speculative in that the Plaintiff claims damages for "possible" injuries.



10. The complaint fails to allege for what period of time the Plaintiff was allegedly caused to be away from her work.

11. The allegations of COUNT TWO fail to allege that the Defendant wilfully and wantonly injured the person of the Plaintiff.

12. The allegations of COUNT TWO fail to allege that the injuries and damages complained of were the proximate result of the alleged wilful and wanton act of the Defendant.

CHASON & STONE

FILED
JUL 23 1957
ALICE J. DUCK, Clerk

By:  
Attorneys for Defendant

NAOMI F. DEWEY,
Plaintiff,

vs.

BETTY JO SANSPREE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 3279

DEMURRER

8/27/57 *Refiled*
1 hour later
Judge

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

NAOMI F. DEWEY,

Plaintiff,

vs.

BETTY JO SANSPREE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 3279

PLEA


Comes now the Defendant in the above styled cause and for answer to the complaint as last amended heretofore filed against her, and to each count thereof, separately and severally, pleads, separately and severally, as follows:

1. Not guilty.

The Defendant, for further answer to Count One of said complaint alleges that at the time and place therein complained of the Plaintiff was guilty of negligence which proximately contributed to the injuries and damages allegedly sustained by her in that she so negligently operated her automobile at said time and place as to cause or allow the same to run into, upon and against and to collide with the automobile being then and there operated by the Defendant, hence she should not recover.

CHASON & STONE

Filed Mar. 4, 1958
Alice J. Duck
clerk

By: 
Attorneys for Defendant, Betty
Jo Sanspree and as Guardian Ad
Litem for Betty Jo Sanspree, a
Minor.

NAOMI F. DEWEY,

Plaintiff,

vs.

BETTY JO SANSPREE,

Defendant.

PLEA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 3279

FILED

MAR 4 1958

ALICE J. DECK, Register

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

NAOMI F. DEWEY,

Plaintiff,

vs.

BETTY JO SANSPREE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 3279

MOTION TO STRIKE

FILED

AUG 14 1957

ALICE L. BUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

NAOMI F. DEWEY,

Plaintiff,

vs.

BETTY JO SANSPREE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 3279

MOTION TO STRIKE

FILED

AUG 14 1957

ALICE L. BUCK, CLERK

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

That the defendant in this cause is a minor over the age of 14 years; that said minor defendant is insured under the terms of an automobile liability insurance policy issued by Farmers' Mutual Auto Insurance Company which is located at 3097 E. Madison Avenue, Madison, Wisconsin; that the plaintiff suffered a property damage loss and personal injuries to a great extent as shown by the allegations of the complaint in this cause; that prior to the institution of this suit the plaintiff, through her attorneys, offered, without prejudice to her rights, to settle her claim within the limits of the liability of said company for the property damage and personal injuries suffered by the plaintiff in the accident referred to in the complaint; that the adjuster representing said company refused to disclose the amount of the limits of liability of said company; that said company did not accept the offer of the plaintiff, made without prejudice to the rights of the plaintiff, to settle the plaintiff's claim within the limits of its policy; that the law firm of Chason & Stone has appeared in this cause on behalf of said minor defendant and at the instance of said insurance company; that no guardian ad litem has been appointed by the Court to defend the minor defendant; that the plaintiff is now willing and by these presents offers, without prejudice to her rights, to settle and compromise this suit for property damage and personal injuries for the amount of the limits of liability provided therefor in said contract of insurance of Farmers' Mutual Auto Insurance Company located in Madison, Wisconsin; that, at the present time the complaint shows unto the Court the following:

Comes now the plaintiff in the above styled cause and

MOTION

NAOMI F. DEWEY,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA
-vs-	*	AT LAW
BETTY JO SANSFEE,	*	NO. 3279
Defendant.	*	

in this suit claims damages of Betty Jo Sanspree in the amount

of \$50,000.00; that if this suit were to be settled by said

company within the limits of liability contained in said

policy, said minor defendant, Betty Jo Sanspree, would be

relieved of any personal liability to the plaintiff as a result

of this accident but if the said company negligently fails or

refuses to settle this suit for the amount of the limits con-

tained in said policy, then there will be the legal question

presented as to whether the said Betty Jo Sanspree personally

owed the difference between the amount of any such judgment

and the limits of said policy or whether the company would

owe the same.

WHEREFORE, the premises considered, the plaintiff moves

the court to appoint a guardian ad litem for said minor

defendant, Betty Jo Sanspree, who will be free to protect said

minor against the possibility of the negligent failure of said

company to settle or compromise this suit within the limits

of said policy and whose interest or whose client's interest

will not be adverse to that of said minor defendant.

McCONNELL & FOREMAN

By Alexander Foreman, Jr.
Attorneys for Plaintiff

STATE OF ALABAMA:
COUNTY OF MOBILE:

Before me, a Notary Public in and for said county in

said state, personally appeared Alexander Foreman, Jr.

who on oath deposes and says that he is one of the attorneys

representing the plaintiff in the foregoing cause and that

the facts alleged in the foregoing motion are true and correct

according to his best information and belief.

Alexander Foreman, Jr.

Subscribed and sworn to before me
this 27th day of July, 1957.

Clare A. Stone
Notary Public, Mobile County, Alabama

Serve a copy on:

Messrs. Chason & Stone

Attorneys

Bay Minette, Alabama

232

Attmore, Alabama

Route 4, Box 107

Betty Jo Sanspree

Mr. Hosey or Mrs.

Willie Mae Sanspree

Route 4, Box 107

Attmore, Alabama

S U M M O N S

STATE OF ALABAMA:

COUNTY OF BALDWIN:

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Betty Jo Sanspree to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and then and there to plead, answer or demur to the complaint of Naomi F. Dewey.

Witness my hand this 25 day of June, 1957.

Reuben J. Clark
CLERK

C O M P L A I N T

NAOMI F. DEWEY,
Plaintiff,

-VS-

BETTY JO SANSPREE,
Defendant.

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

COUNT ONE

Plaintiff claims of the defendant the sum of, to-wit, Fifty Thousand and No/100 Dollars (\$50,000.00), as damages, for that, heretofore, and on, to-wit, the 4th day of July, 1956, an automobile of the Plaintiff in which the Plaintiff was then and there riding was being operated on and along Alabama Highway 89 at a point thereon approximately seven (7) miles southeast of Fairhope, Alabama, said highway being then and there a public highway in Baldwin County, Alabama, and at said time and place the defendant, Betty Jo Sanspree, so negligently operated a motor vehicle on and along said highway as to cause the same to collide with the said automobile of the Plaintiff and as a proximate result of the said negligence of the defendant, Betty Jo Sanspree, the said automobile of the Plaintiff was smashed and broken, the right front

fender, and hood were bent and broken, the frame of said automobile was broken, bent and knocked out of line, the engine and component parts and other mechanisms of said automobile were bent broken, crushed and otherwise damaged, and Plaintiff was caused the loss of use of her said automobile for a long period of time and the Plaintiff suffered serious personal injuries consisting of a tranverse fracture of right femur at the junction of the middle and upper third, an incomplete fracture of the inter-trochanteric portion of the right femur, a sprained knee, and a possible lacerated meniscus, she was made nervous and otherwise sick, lame and sore, she was caused to undergo surgical operations and was confined in a hospital on two different occasions for long periods of time, she was caused to be away from her work for long periods of time and subsequently caused to have to cease working, she was caused to lose and will be caused to continue to lose wages in the future, she suffered and in the future will continue to suffer physical pain and mental anguish and she was permanently injured, and Plaintiff incurred and will incur in the future expenses for medical and hospital attention and treatment in connection with said injuries suffered by the Plaintiff.

And Plaintiff avers that all of the said injuries and damages were the proximate result of the negligence of the defendant, wherefore this suit.

COUNT TWO

The Plaintiff claims of the defendant the sum of, to-wit, Fifty Thousand and No/100 Dollars (\$50,000.00), as damages, for that heretofore, on, to-wit, July 4, 1956, an automobile of the Plaintiff in which the Plaintiff was then and there riding was being operated on and along Alabama Highway 89 at a point approximately seven (7) miles southeast of Fairhope, Alabama, said highway being then and there a public highway in Baldwin County, Alabama, and at said time and place the defendant, Betty

Jo Sanspree, willfully and wantonly damaged the Plaintiff's said automobile and injured the person of the Plaintiff by so willfully or wantonly operating a motor vehicle on and along said highway at said time and place, as to cause the same to collide with the Plaintiff's automobile in which she was riding at said time and place and as a proximate consequence thereof: the said automobile of the Plaintiff was smashed and broken, the right front fender and hood were bent and broken, the frame of said automobile was broken, bent and knocked out of line, the engine and component parts and other mechanisms of said automobile were bent, broken, crushed and otherwise damaged, and Plaintiff was caused the loss of use of her said automobile for a long period of time and the Plaintiff suffered serious personal injuries consisting of a tranverse fracture of the right femur, a sprained knee, and a possible lacerated meniscus, she was made nervous and otherwise sick, lame and sore, she was caused to undergo surgical operations and was confined to the hospital on two different occasions for long periods of time, she was caused to be away from her work for long periods of time and subsequently was caused to have to cease working, she was caused to lose and will be caused to continue to lose wages in the future, she suffered and in the future will continue to suffer physical pain and mental anguish and she was permanently injured, and plaintiff incurred and will incur in the future expenses for medical and hospital attention and treatment in connection with said injuries suffered by the Plaintiff.

WHEREFORE, Plaintiff claims damages from the defendant in the amount of Fifty Thousand and No/100 Dollars (\$50,000.00) with costs.

McCONNELL & FOREMAN

By Alexander Foreman
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

McCONNELL & FOREMAN

By Alexander Foreman
Attorneys for Plaintiff

Defendants' address:
Route 4, Box 107
Atmore, Alabama

Filed Jan. 25, 1957
Executed 7/8/57

NAOMI F. DEWEY,
Plaintiff,

vs.

BETTY JO SANSPREE,
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3279

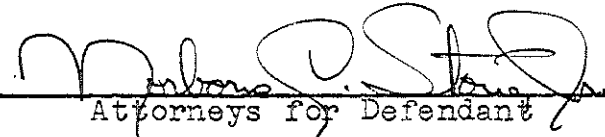
ORDER TO SUBPOENA WITNESS

TO: ALICE J. DUCK, CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW:

Comes now the Defendant in the above cause, by her Attorneys, and notice having been given to the adverse party as required by Law of the Taking of Deposition Upon Oral Examination of Naomi F. Dewey, whose address is 2050 Dauphin Street, Mobile, Alabama, at the office of Louise Dusenbury in the Courthouse in Bay Minette, Alabama on February 1, 1958 at 9:00 A.M., and hereby file their order for the said Naomi F. Dewey to be subpoenaed by the Clerk of the Court in which the above styled cause is now pending.

Dated this 16th day of January, 1958.

CHASON & STONE

By: 
Attorneys for Defendant

Order To Subpoena Witness
(Naomi F. Dewey)

FILED

JAN 16 1958

ALICE J. BUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

NAOMI F. DEWEY,	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY, ALABAMA
-vs-	*	AT LAW
BETTY JO SANSPREE,	*	NO. 3279
Defendant.	*	

TO: Messrs. Chason and Stone
Attorneys at Law
Bay Minette, Alabama,

and

Messrs. Chason and Stone,
as guardians ad litem for
Betty Jo Sanspree, a minor.
Attorneys at Law
Bay Minette, Alabama

Please take notice that at 10:00 A.M., on the 1st day of February, 1958, at the office of Judge Hubert Hall, Court House, Bay Minette, Alabama, the plaintiff, Naomi F. Dewey, will take the deposition of Betty Jo Sanspree whose address is Route 4, Box 107, Atmore, Alabama, and Annie Ruth Ray (Mrs. Arthur Ray) whose address is Route 4, Box 107, Atmore, Alabama, upon oral examination pursuant to an Act of the Legislature of the State of Alabama, designated as Act No. 375, Regular Session, 1955, approved September 8, 1955, before Louise Dusenbury, an officer authorized to administer oath in the County of Baldwin, State of Alabama, and an official Court Reporter for the Circuit Court of Baldwin County, Alabama, duly authorized to take depositions and swear witnesses in said County in said State. The oral examination will continue from day to day until completed and you are invited to attend and cross-examine.

McCONNELL & FOREMAN

By: 
Attorneys for Plaintiff

NAOMI F. DEWEY,

Plaintiff,

-vs-

BETTY JO SANSPREE,

Defendant.

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*2

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3279

I, Alexander Foreman, Jr., one of the attorneys for the plaintiff, Naomi F. Dewey, in the above styled cause, do hereby certify that I served the attached and foregoing notice to take the depositions upon oral examination of Betty Jo Sanspree and Annie Ruth Ray (Mrs. Arthur Ray) by mailing the same to Chason and Stone and Chason and Stone, as guardians ad litem for Betty Jo Sanspree, a minor, attorneys of record for the defendant, Betty Jo Sanspree, in said cause on this 13th day of January, 1958.


Alexander Foreman, Jr.

NAOMI F. DEWEY,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
BETTY JO SANSPREE,	X	
Defendant.	X	AT LAW NO. 3279
	X	

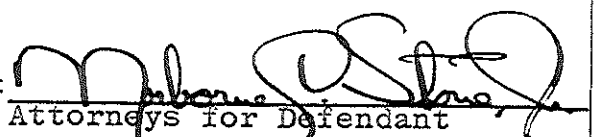
NOTICE OF TAKING OF DEPOSITION UPON ORAL EXAMINATION

TO: HON. ALEXANDER FOREMAN, JR., ATTORNEY AT LAW, ANNEX FIRST NATIONAL BANK BUILDING, MOBILE, ALABAMA, AS ATTORNEY FOR NAOMI F. DEWEY.

Please take notice that the Deposition Upon Oral Examination of Naomi F. Dewey, the Plaintiff in the above styled cause, whose address is 2050 Dauphin Street, Mobile, Alabama, will be taken on Saturday, February 1, 1958, at 9:00 A. M. before Louise Dusenbury, a Notary Public, in and for the State of Alabama at Large, who is hereby designated as the officer before whom such deposition shall be taken, at her office in the Courthouse in Bay Minette, Alabama.

Dated this the 15th day of January, 1958.

CHASON & STONE

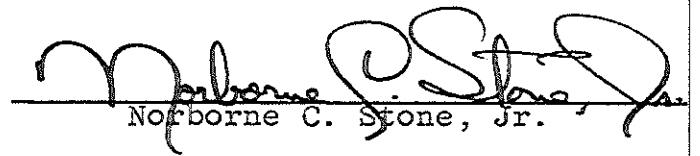
By: 
Attorneys for Defendant

STATE OF ALABAMA

BALDWIN COUNTY

I, Norborne C. Stone, Jr., one of the attorneys of record for Betty Jo. Sanspree, the Defendant in the above styled cause, do hereby certify that I have this day mailed a copy of the foregoing Notice of Taking of Deposition Upon Oral Examination to Hon. Alexander Foreman, Jr., one of the attorneys of record for the Plaintiff in the above styled cause, postage prepaid and properly addressed to him at his office in the Annex of the First National Bank Building in Mobile, Alabama.

Done this the 15th day of January, 1958.


Norborne C. Stone, Jr.

Notice of Taking of Deposition
Upon Oral Examination of
Naomi F. Dewey.

FILED

JAN 16 1958

ALICE L. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

MCCONNELL & FOREMAN

ATTORNEYS AT LAW

SUITE 214 FIRST NATIONAL BANK ANNEX

MOBILE 13, ALABAMA

ALVIN MCCONNELL
ALEXANDER FOREMAN, JR.
GEORGE E. McNALLY

August 21, 1957

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

Re: Naomi F. Dewey vs. Betty Jo
Sanspree
At Law No. 3279


Dear Mrs. Duck:

Enclosed herewith you will please find, in triplicate, an amendment to the complaint in the above styled cause which we shall appreciate your causing to be filed. One of the copies enclosed herewith is for Chason & Stone as Guardians Ad Litem for Betty Jo Sanspree, a minor, and the other is for Chason & Stone, attorneys for the defendant. Please see that each of these copies reach them in each of these capacities.

Your courtesies in this regard will be appreciated.

Yours very truly,

MCCONNELL & FOREMAN

By: 
Alexander Foreman, Jr.

AFJr/bt

Brewton, Ala.,

July 30 1957

TO THE SHERIFF... Baldwin... COUNTY,

Bay Minette... ALABAMA.

Dear Sir:

I enclose herewith...

Your A.C. for Betty Jo Sampson
+ Horey Sampson served this 30th day
of July 1957 in person

~~Please serve and return as early as possible.~~

Otis R. Emmon

Sheriff, Escambia County, Alabama.

~~(If not found in your county please advise promptly, giving information as to present location, if possible).~~

MCCONNELL & FOREMAN

ATTORNEYS AT LAW

SUITE 214 FIRST NATIONAL BANK ANNEX

MOBILE 13, ALABAMA

ALVIN MCCONNELL
ALEXANDER FOREMAN, JR.
GEORGE E. McNALLY

June 24, 1957

Mr. Alice J. Duck, Clerk
Circuit Court of Baldwin County
County Court House
Bay Minette, Alabama

Re: Naomi F. Dewey vs. Betty Jo.
Sanspree
In the Circuit Court of
Baldwin County, Alabama

Dear Mrs. Duck:

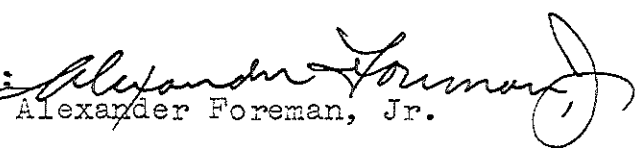
We enclose herewith the original and two copies of the Summons and Complaint in connection with the above captioned matter. Please have the sheriff serve a copy on Betty Jo Sanspree and another copy on either the father or mother of Betty Jo Sanspree. We understand that Betty Jo Sanspree lives with one or both of her parents but we do not know either of their names. Please therefore have the sheriff serve either of the parents and note on the return the name of the parent that he has served as the parent of Betty Jo Sanspree.

Due to the fact that the statute of limitations is about to run on this case we shall appreciate your noting on the bottom of the copy of this letter that you have received and filed the summons and complaint.

We wish to thank you for your courtesies in this matter.

Yours very truly,

MCCONNELL & FOREMAN

By: 
Alexander Foreman, Jr.

AFJr/bt

NAOMI F. DEWEY,
Plaintiff,
vs.
BETTY JO SANSPREE,
Defendant.

I
I
I
I
I
I
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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. 3279

NOTICE OF FILING OF DEPOSITION UPON ORAL
EXAMINATION OF NAOMI F. DEWEY

TO: HONORABLE ALEXANDER FOREMAN, JR., ONE OF THE ATTORNEYS OF RECORD
FOR NAOMI F. DEWEY:

You are hereby notified that the deposition taken upon oral examination of Mrs. Naomi F. Dewey on February 1, 1958 in the above styled cause was filed with the Clerk of the Circuit Court of Baldwin County, Alabama by Louise Dusenbury, the officer before whom such deposition was taken, on February 25, 1958.

Done this 4th day of March, 1958.

CHASON & STONE

By: 

STATE OF ALABAMA
BALDWIN COUNTY

I, Norborne C. Stone, Jr., one of the attorneys of record for the Defendant in the above styled cause do hereby certify that I have this day mailed a copy of the foregoing notice to Hon. Alexander Foreman, Jr., one of the attorneys of record for the Plaintiff in the above styled cause, by United States mail, postage prepaid and properly addressed to him at his office in Suite 214 First National Bank Annex, Mobile 13, Alabama.

Done this 4th day of March, 1958.


Norborne C. Stone, Jr.

9273

FILED

MAR 4 1958

ALICE J. BUCK, Register

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA