

JAMES W. HOWELL
ATTORNEY AT LAW
FOLEY, ALABAMA 36535

Post Office Box 206

AREA CODE 205-943-3602

May 19, 1966

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

Re: Glen Everage
vs
Dave McCreary

Dear Mrs. Duck,

Enclosed please find Summons and Complaint in
the above styled case.

The Defendant resides at 2003 First Ave., Prichard
Alabama or may be served with process at Smith-Kelly
Supply Company, Inc., Mobile, Alabama.

Thank you,

James W. Howell
James W. Howell *by S.K.*

JWH/bn

THE STATE OF ALABAMA) CIRCUIT COURT, BALDWIN COUNTY
BALDWIN COUNTY) NO. 6969

_____, TERM, 1966

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby Commanded to Summon Dave McCreary to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against DAVE MCCREARY, Defendant by GLEN EVERAGE, Plaintiff.

Witness my hand this 23 day of May, 1966.

W. J. Howell, Clerk

C O M P L A I N T

GLEN EVERAGE
PLAINTIFF

vs

DAVE MCCREARY
DEFENDANT

Plaintiff claims of the defendant Five Hundred Dollars (\$500.00) damages for that heretofore on, to-wit: the 10th day of March, 1966, the plaintiff had lawfully parked his truck on Spanish Main Street, a public street where he had a lawful right to park, in Spanish Fort Estates Subdivision, Baldwin County, Alabama; that then and there the defendant negligently drove a truck into, upon, or against plaintiff's truck, and as a direct and proximate result and consequence of the defendant's said negligence the plaintiff's truck was greatly damaged as follows, to-wit: the left rear storage compartment door was crushed and demolished, the left rear corner body panel was crushed and demolished, the compact body was knocked out alignment and pulled loose, the paint was scraped and damaged, Plaintiff lost use thereof for approximately 3 days, and plaintiff has lost much time from his labors as an Electrical Contractor, which said labors are reasonably worth Thirty Dollars (\$30.00) per day, all to his damage in the amount aforesaid, hence this suit.

James W. Howell
James W. Howell,
Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury.

James W. Howell
James W. Howell, Attorney for Plaintiff

MM- M.6969 54/6

Received 23 day of May 1966
and on _____ day of _____ 19____
I served a copy of the within etc
on Dave McCreary

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

Allen Everage
vs.
N Dave McCreary

RETURNED 6-2-66
Not found in my County after all-
gent search and inquiry.
RAY D. BRIDGES, Sheriff
By L. M. M. W. D. I.

BY _____
MAY 24 - 9 02 AM '66
REC'D. SHERIFF DEPT.
MIDDLEBURY COUNTY, IOWA

FILED

MAY 23 1966

ALICE R. DICK, CLERK
SHERIFF

address
2002 First Ave
Smith, Iowa

THE STATE OF ALABAMA) CIRCUIT COURT, BALDWIN COUNTY
BALDWIN COUNTY) NO. 6969

TERM, 1966

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby Commanded to Summon Dave McCreary to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against DAVE MCCREARY, Defendant by GLEN EVERAGE, Plaintiff.

Witness my hand this 23 day of May, 1966.

Wing L. Smith, Clerk

C O M P L A I N T

GLEN EVERAGE
PLAINTIFF

vs

DAVE MCCREARY
DEFENDANT

Plaintiff claims of the defendant Five Hundred Dollars (\$500.00) damages for that heretofore on, to-wit: the 10th day of March, 1966, the plaintiff had lawfully parked his truck on Spanish Main Street, a public street where he had a lawful right to park, in Spanish Fort Estates Subdivision, Baldwin County, Alabama; that then and there the defendant negligently drove a truck into, upon, or against plaintiff's truck, and as a direct and proximate result and consequence of the defendant's said negligence the plaintiff's truck was greatly damaged as follows, to-wit: the left rear storage compartment door was crushed and demolished, the left rear corner body panel was crushed and demolished, the compact body was knocked out alignment and pulled loose, the paint was scraped and damaged, Plaintiff lost use thereof for approximately 3 days, and plaintiff has lost much time from his labors as an Electrical Contractor, which said labors are reasonably worth Thirty Dollars (\$30.00) per day, all to his damage in the amount aforesaid, hence this suit.

James W. Howell
James W. Howell,
Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury.

James W. Howell
James W. Howell, Attorney for Plaintiff

FILED

MAY 23 1966

ALICE L. DICK, CLERK

JAMES W. HOWELL
ATTORNEY AT LAW
FOLEY, ALABAMA 36535

Post Office Box 206

AREA CODE 205-943-3602

September 19, 1966

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

RE: Everage vs. McCreary
Case No. 6969

Dear Mrs. Duck:

Enclosed please find Summons and Amended Complaint in
the above styled case.

The Defendant resides at 764 Stanton Road, Mobile,
Alabama.

Thank you.

Most cordially,

James W. Howell
James W. Howell

JWH:ec
enc:

THE STATE OF ALABAMA)
BALDWIN COUNTY)

CIRCUIT COURT, BALDWIN COUNTY
NO. 6969

_____TERM, 1966

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby Commanded to Summon David L. McCreary to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against DAVID L. MCCREARY, Defendant by GLEN EVERAGE, Plaintiff.

Witness my hand this 20 day of June, 1966.

Deirda Duck, Clerk

A M E N D E D
C O M P L A I N T

GLEN EVERAGE
PLAINTIFF

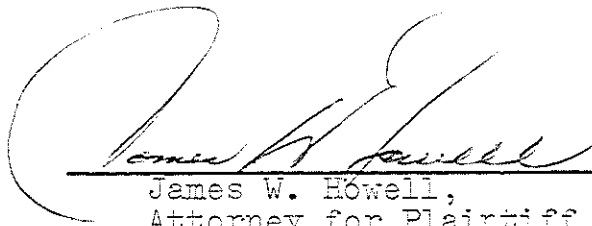
VS

DAVID L. MCCREARY
DEFENDANT

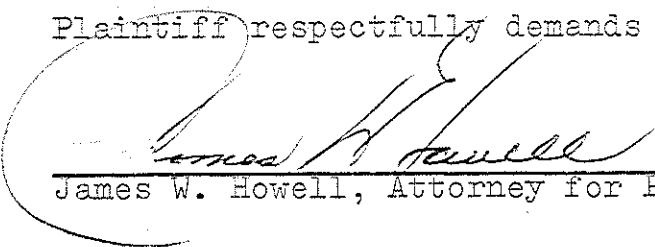
Comes the Plaintiff in the above styled cause and by leave of Court amends his complaint heretofore filed as follows:

The Christian name of defendant as reads Dave McCreary is amended to read David L. McCreary, defendant.

Plaintiff claims of the defendant Five Hundred Dollars (\$500.00) damages for that heretofore on, to-wit: the 10th day of March, 1966, the plaintiff had lawfully parked his truck on Spanish Main Street, a public street where he had a lawful right to park, in Spanish Fort Estates Subdivision, Baldwin County, Alabama; that then and there the defendant negligently drove a truck into, upon, or against plaintiff's truck, and as a direct and proximate result and consequence of the defendant's said negligence the plaintiff's truck was greatly damaged as follows, to-wit: the left rear corner body panel was crushed and demolished, the compact body was knocked out of alignment and pulled loose, the paint was scraped and damaged, Plaintiff lost use thereof for approximately 3 days, and plaintiff has lost much time from his labors as an Electrical Contractor, which said labors are reasonably worth Thirty Dollars (\$30.00) per day, all to his damage in the amount aforesaid, hence this suit.


James W. Howell,
Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury.


James W. Howell, Attorney for Plaintiff

THE DEFENDANT MAY BE SERVED AT: 764 Stanton Road,
Mobile, Alabama

67-9-30-66

FILED
JUN 20 1966
JUN 1 1966
RECEIVED

h no. 6967 5596

Received 20 day of Sept. 1966
and on 30 day of Sept. 1966
I served a copy of the within
on David L. McCreary

Glenn Everage

vs.

David L. McCreary

By service on
TAYLOR WILKINS, Sheriff
By Geo. Morris D.S.

501/mon

FILED
SEP 20 1966
JAMES L. HICK, CLERK

REC'D. SHERIFF DEPT.
HOOPER COUNTY, ALA.
SEP 21 9 06 AM '66

Mr. W. Farwell
attys