

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 7017

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Home Specialty Pest Control Company

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 Home Specialty  
Pest Control Company, Defendant .....

by Manford Welch

Plaintiff .....

Witness my hand this 10<sup>th</sup> day of June 1966

Ellice J. Black Clerk

No. 7012 sm Page 3513 3454

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

MANFORD WELCH

Plaintiffs

vs.

HOME SPECIALTY PEST CONTROL  
COMPANY

*Home Pest Control*  
SUMMONS and COMPLAINT

Filed *Warrior Rural* 19

*L. Odell Saxe Sewe* Clerk

*Sewe on*

*Mark R. Leif*

*At 1- Asheville Ala.*

*C. LeNoy Thompson*

Plaintiff's Attorney

99. WA 01 11 11 AM

Defendant's Attorney

REC'D SHERIFF DEPT.

Defendant *MELVIN BAILEY*  
Serve Mr. Bob Jones, Manager  
Home Specialty Pest Control  
Co., *Dr. Richard Alabama*  
**RECEIVED**

Executed this the *JUN 10 JUL 1 1966* Day of 196  
Sheriff

By *TAYLOR WILKINS*

I have executed this

this 19

by leaving a copy with

*Jefferson County*

*BAILEY*

of said co

*MELVIN BAILEY*

Jefferson County, Alabama

By *MELVIN BAILEY*

Not Issued in my County after all

sent each and is copy.

*RAY D. BRYCE* Sheriff

By *L.B. Smith*

process(es) and \$1.00

travel expense on each of

process(es) or a total of

*30-60*

Not Issued in my County after all

sent each and is copy.

*RAY D. BRYCE* Sheriff

By *L.B. Smith*

process(es) and \$1.00

travel expense on each of

process(es) or a total of

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*RAY D. BRYCE* Sheriff

By *L.B. Smith*

process(es) and \$1.00

travel expense on each of

process(es) or a total of

*30-60*

Not Issued in my County after all

sent each and is copy.

WINDELL C. OWENS

Attorney At Law

MONROEVILLE, ALABAMA

July 12, 1966

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

Re: Cade v Porters  
Case No. 7018

Dear Mrs. Duck:

I will appreciate your filing the enclosed  
Appearance for the Defendant in the above case. I have  
mailed the attorney for the Plaintiff a copy of the  
pleading.

Yours very truly,

*Windell C. Owens*  
Windell C. Owens *By HW*

WCO/hw

Enclosure

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON  
LAWYERS

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:  
P. O. BOX 123

CABLE ADDRESS:  
HAB

TELEPHONE:  
432-5511  
AREA CODE 205

CHAS. C. HAND  
C. B. ARENDALL, JR.  
T. MASSEY BEDSOLE  
THOMAS G. GREAVES, JR.  
WM. BREVARD HAND  
VIVIAN G. JOHNSTON, JR.  
PAUL W. BROCK  
ALEX F. LANKFORD, III  
EDMUND R. CANNON, JR.  
LYMAN F. HOLLAND, JR.  
J. THOMAS HINES, JR.  
DONALD F. PIERCE  
LOUIS G. BRASWELL  
HAROLD D. PARKMAN  
G. PORTER BROCK, JR.  
HARWELL E. COALE, JR.  
STEPHEN G. CRAWFORD  
JERRY A. MCDOWELL  
W. RAMSEY MCKINNEY, JR.  
LARRY U. SIMS  
C. WAYNE LOUDERMILCH

June 10, 1966

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

Re: Cade v. Porters  
Our File: CWL 7207

7018

Dear Madam:

Please file the enclosed Complaint in the case of  
Abraham Cade v. William Porters.

Many thanks for your assistance in this matter.

Yours very truly,

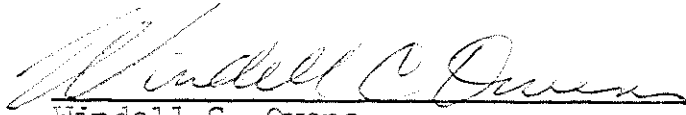
*Wayne Loudermilch*  
For the Firm

CWL.pd  
Encl.

|                  |   |                          |
|------------------|---|--------------------------|
| ABRAHAM CADE,    | ) |                          |
| PLAINTIFF        | ) | IN THE CIRCUIT COURT OF  |
| VS               | ) | BALDWIN COUNTY, ALABAMA, |
| WILLIAM PORTERS, | ) | AT LAW                   |
| DEFENDANT        | ) | CASE NO. 7018            |

Now comes the Defendant in the above styled cause and demurs to the Complaint heretofore filed in this cause and as grounds for demurrer sets out and assigns the following separate and several grounds:

1. Said Complaint does not state a cuase of action.

  
 -Windell C. Owens  
 Attorney for Defendant  
 Monroeville, Alabama

FILED  
 JUL 13 1962  
 ALBANY, ALA.

ABRAHAM CADE, : IN THE CIRCUIT COURT  
Plaintiff : OF BALDWIN COUNTY,  
VS. : ALABAMA  
WILLIAM PORTERS, : AT LAW  
Defendant : CASE NO. 7018

COUNT ONE

Plaintiff claims of the Defendant the sum of Two Thousand and No/100 (\$2,000), damages, for that heretofore and on, to-wit, July 11, 1965, on or near United States Highway 31, to-wit, approximately 2.8 miles South of Stapleton, at which point said highway is a public road in the County of Baldwin, the defendant did so negligently operate a motor vehicle as to cause the same to run into, against, or upon the car owned by the plaintiff, and as a direct and proximate result of the defendant's negligence as aforesaid the plaintiff's car was badly bent, broken, and crushed, hence this suit.

*C. Wayne Loudermilch*  
C. Wayne Loudermilch  
Attorney for Plaintiff  
First National Bank Building  
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE,  
GREAVES & JOHNSTON

Address of Defendant:  
William Porters  
Route 1, Box 234  
Frisco City, Alabama

FILED

JUN 10 1966

ALL I DO, I DO IT

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7018

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William Porters

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

William Porters, Defendant

by Abraham Cade

Plaintiff

Witness my hand this 13th day of June 1966

Alice D. Luck Clerk

24:6-24-66

No. 7018

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ABRAHAM CADE

Plaintiffs

vs.

WILLIAM PORTERS

Defendants

SUMMONS AND COMPLAINT

Filed June 13th 1966

Alice J. Duck Clerk

Hand, Arendall, Bedsole, Greaves & Johnston

P.O. Box 123-Mobile  
Attention: Hon. C. Wayne Loudermilk

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

JUN 13 1966

19.....

TAYLOR WILKINS

Sheriff

Sheriff

I have executed this summons

this June 24 1966

by leaving a copy with

William Porters

E. L. Watson  
J. Blanton

Sheriff

Deputy Sheriff

WINDELL C. OWENS

Attorney At Law

MONROEVILLE, ALA. 36460

September 25, 1967

Mrs. Alice Duck  
Circuit Clerk  
Baldwin County  
Bay Minette, Alabama

Re: Cade vs Porters  
Case No. 7018

Dear Mrs. Duck:

I will appreciate your withdrawing my name as attorney of record for the Defendant in this case. I have made repeated efforts to have the Defendant come by to discuss this case with me and I am today advising him that I have withdrawn as his attorney.

Yours very truly,

  
Windell C. Owens

WCO/hw

CC: Mr. Wayne Loudermitch  
Attorney At Law  
Mobile, Alabama

William Porters  
Frisco City, Alabama

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