

LAW OFFICES  
HOLBERG, TULLY AND HODNETTE

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MOBILE, ALABAMA

36601

TELEPHONE

432-8863

RALPH G. HOLBERG, JR.  
ALBERT J. TULLY  
ROBERT E. HODNETTE, JR.  
A. NEIL HUDGENS  
RALPH G. HOLBERG, III  
JACK W. MORGAN

August  
5th,  
1966

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

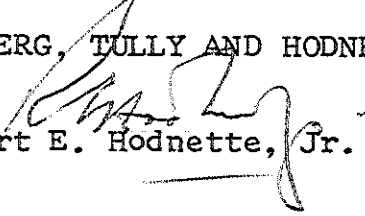
Re: Dorothy M. Owens  
vs. Stephen Yearley, and  
Jesse M. Owens  
vs. Stephen Yearley

Dear Mrs. Duck:

I enclose two complaints against one Stephen Yearley. I will send you the address for service in a very few days. I will appreciate immediate filing inasmuch as the statute of limitations is about to expire.

Very truly yours,

HOLBERG, TULLY AND HODNETTE

  
Robert E. Hodnette, Jr.

R  
E  
H  
/  
mr

encls.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 7107

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Stephen Yearley

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.....

Stephen Yearley....., Defendant.....

by ~~Jesse~~ Jesse M. Owens.....

....., Plaintiff.....

Witness my hand this.....5.....day of.....August.....1966.....

Defendant's address: 3040 Binkley, Dallas, Texas

*Oliver J. Ruck*..... Clerk

No. ....

Page. ....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

I have executed this summons

19.....

this .....  
by leaving a copy with

Sheriff

Deputy Sheriff

JESSE M. OWENS, \* IN THE CIRCUIT COURT  
Plaintiff, \* OF  
vs. \* BALDWIN COUNTY, ALABAMA  
STEPHEN YEARLEY, \* AT LAW  
Defendant. \* NO. \_\_\_\_\_

COUNT ONE

Plaintiff claims of the Defendant the sum of TEN THOUSAND AND NO/100 (\$10,000.00) DOLLARS as damages for that heretofore and on, to-wit, the 7th day of August, 1965, the Defendant so negligently operated a motor vehicle which he was driving eastwardly on U. S. Highway 90 in Loxley, Baldwin County, Alabama, which is a public highway in Baldwin County, Alabama, as to cause or allow the same to run into, upon or against another automobile which was stopped in a line of traffic headed eastwardly on said Highway 90 at said time and place, which in turn caused the said automobile to be knocked, pushed or shoved into the rear of the automobile which the Plaintiff was driving but which was also stopped in a line of traffic, and as a direct and proximate consequence of said negligence, the Plaintiff was severely bruised and injured, he suffered a whip lash injury to his spine, he suffered great pain and anguish and will continue to suffer great pain and anguish and was caused to incur doctors' bills in and about the treatment of his injuries; hence this suit.

HOLBERG, TULLY AND HODNETTE  
Attorneys for Plaintiff

By \_\_\_\_\_

Plaintiff demands a trial of this cause by a Jury.

HOLBERG, TULLY AND HODNETTE  
Attorneys for Plaintiff

By \_\_\_\_\_

JESSE M. OWENS,	*	IN THE CIRCUIT COURT
Plaintiff,	*	OF
vs.	*	BALDWIN COUNTY, ALABAMA
STEPHEN YEARLEY,	*	AT LAW
Defendant.	*	NO. <u>9109</u>

COUNT ONE

Plaintiff claims of the Defendant the sum of TEN THOUSAND AND NO/100 (\$10,000.00) DOLLARS as damages for that heretofore and on, to-wit, the 7th day of August, 1965, the Defendant so negligently operated a motor vehicle which he was driving eastwardly on U. S. Highway 90 in Loxley, Baldwin County, Alabama, which is a public highway in Baldwin County, Alabama, as to cause or allow the same to run into, upon or against another automobile which was stopped in a line of traffic headed eastwardly on said Highway 90 at said time and place, which in turn caused the said automobile to be knocked, pushed or shoved into the rear of the automobile which the Plaintiff was driving but which was also stopped in a line of traffic, and as a direct and proximate consequence of said negligence, the Plaintiff was severely bruised and injured, he suffered a whip lash injury to his spine, he suffered great pain and anguish and will continue to suffer great pain and anguish and was caused to incur doctors' bills in and about the treatment of his injuries; hence this suit.

HOLBERG, TULLY AND HODNETTE  
Attorneys for Plaintiff

By 

Plaintiff demands a trial of this cause by a Jury.

HOLBERG, TULLY AND HODNETTE  
Attorneys for Plaintiff

By 

FILED

AUG 5 1966

APRIL DICK, CLERK  
REGISTRY

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7107

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ..... Stephen Yearley

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.....

Stephen Yearley

....., Defendant.....

by ..... Jessé M. Owens

....., Plaintiff.....

Witness my hand this 5 day of August 19 66.

Defendant's address: 3040 Binkley, Dallas, Texas

*Alice J. [Signature]* Clerk

*executed 9-23-66 by serving sec. state  
Mrs. Butler  
by Billy White - wls*

No. 7107

Page.....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

JESSE M. OWENS

Plaintiffs

vs.

STEPHEN YEARLEY

Defendants

SUMMONS AND COMPLAINT

Filed 8-5-66 19.....

Alice J. Duck Clerk

Holberg, Tully & Hodnotte  
Plaintiff's Attorney

Defendant's Attorney

237

RECEIVED

SEP 22 1966

RECEIVED IN OFFICE  
Taylor Wilkins  
SHERIFF

SEP 22 1966

RECEIVED  
Received In Office  
M. S. BUTLER, Sheriff

AUG 12 1966

TAYLOR WILKINS, Sheriff

I have executed this summons

this 23 Sept 1966  
by leaving a copy with

Agness Baggett  
As Sec of State

The Sheriff claims 2  
miles at 10c per mile for a total  
of \$200  
M. S. Butler, Sheriff  
Montgomery County, Ala.

M. S. Butler, Sheriff  
Billy White, Deputy Sheriff