

CUNNINGHAM, BOUNDS AND BYRD

ATTORNEYS AT LAW

1350 DAUPHIN STREET

P. O. BOX 4486

MOBILE, ALABAMA 36604

ROBERT T. CUNNINGHAM  
RICHARD BOUNDS  
ROBERT L. BYRD, JR.  
WARREN L. HAMMOND, JR.

AREA CODE 205  
TELEPHONE 438-6188

September 14, 1966

7184

Circuit Court of Baldwin County  
Bay Minette,  
Alabama

Gentlemen:

Will you please file the enclosed suits and acknowledge receipt of same by signing the enclosed carbon copy of this letter and returning it to me in the self-addressed, stamped envelope, which is handed to you herewith.

Yours very truly,

CUNNINGHAM, BOUNDS & BYRD



ROBERT L. BYRD, JR.

RLBjr/ac

Enclosures

CUNNINGHAM, BOUNDS AND BYRD

ATTORNEYS AT LAW

1350 DAUPHIN STREET

P. O. BOX 4486

MOBILE, ALABAMA 36604

December 14, 1966

ROBERT T. CUNNINGHAM  
RICHARD BOUNDS  
ROBERT L. BYRD, JR.  
WARREN L. HAMMOND, JR.

AREA CODE 205  
TELEPHONE 438-6188

Mrs. Alice J. Duck  
Clerk-Register  
Courthouse  
Bay Minette, Alabama

Re: Booth vs. Lewis  
Case Nos. 7184, 7185

Dear Mrs. Duck:

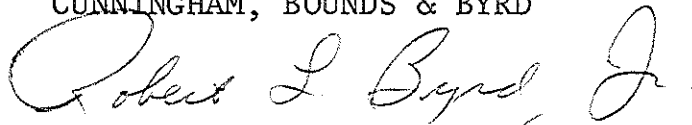
The above referenced cases are set for trial on Friday, December 16th, 1966 and have been settled; however, we cannot dismiss them at this time as we are trying to determine from the insurance company involved if it will be necessary to take a consent judgment in the minor's case.

I am certain these cases will not be tried and would appreciate your having them passed in order to allow us sufficient time to complete our settlement negotiations.

If I need to contact the Judge or if you have any questions regarding this, please call me collect.

Yours very truly,

CUNNINGHAM, BOUNDS & BYRD



ROBERT L. BYRD, JR. <sup>s</sup>

RLBjr:ps

CUNNINGHAM, BOUNDS AND BYRD

ATTORNEYS AT LAW

1350 DAUPHIN STREET

P. O. BOX 4486

MOBILE, ALABAMA 36604

ROBERT T. CUNNINGHAM  
RICHARD BOUNDS  
ROBERT L. BYRD, JR.  
WARREN L. HAMMOND, JR.

AREA CODE 205  
TELEPHONE 438-6188

December 15, 1966

Mrs. Alice J. Duck  
Clerk-Register  
Courthouse  
Bay Minette, Alabama

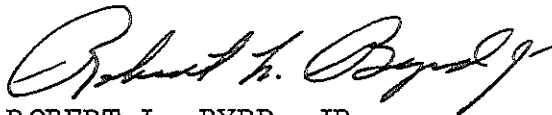
Re: Grace D. Booth v. George Lewis  
Case No. 7184

Dear Mrs. Duck:

Please have the above referenced case dismissed on motion of the Plaintiff, and the cost bill forwarded to Mr. James H. Lackey, attorney for the Defendant.

Yours very truly,

CUNNINGHAM, BOUNDS & BYRD

  
ROBERT L. BYRD, JR.

RLBjr:ps  
cc: Mr. James H. Lackey

GRACE D. BOOTH : IN THE CIRCUIT COURT OF  
 : BALDWIN COUNTY  
Plaintiff, : ~~MOBILE~~, ALABAMA  
 :  
VS: : AT LAW  
 :  
GEORGE LEWIS :  
 :  
 :  
 :  
Defendant. : CASE NO. 7 1 8 4

TO: Hon. Robert L. Byrd, Jr.  
Attorney at Law  
Post Office Box 4486  
Mobile, Alabama 36604

Hon. John V. Duck  
Attorney at Law  
Post Office Box Y  
Fairhope, Alabama

Please take notice that at 4:30 P.M. on the 9th  
day of December, 19 66, in the offices of Dr. Lloyd W. Russell,  
1710 Center Street,  
~~situated at~~, situated at ~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~, Mobile, Alabama, the Defendant \_\_\_\_\_

George Lewis

\_\_\_\_\_, will take the deposition of \_\_\_\_\_  
Dr. Lloyd W. Russell, whose address is 1710 Center Street  
Mobile, 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 William J. Kern, Jr., an officer authorized  
to administer oath in the County of Mobile, State of 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.

COLLINS, GALLOWAY & MURPHY

BY: James H. Lackey

James H. Lackey  
ATTORNEYS FOR DEFENDANT

CERTIFICATE

I, James H. Lackey, Attorney for the Defendant,  
do hereby certify that I served a copy of the above notice to  
take the deposition, upon oral examination of Dr. Lloyd W. Russell  
\_\_\_\_\_, by mailing the same to the Hon. Robert L. Byrd &  
Hon. John V. Duck, Attorney of record for the Plaintiff,  
Grace D. Booth, on this 29th day of November,  
19 66.

James H. Lackey  
James H. Lackey

FILED

NOV 30 1966

GRACE D. BOOTH, : IN THE CIRCUIT COURT OF  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
VS: :  
GEORGE LEWIS, : LAW SIDE  
Defendant. : CASE NO. 7 1 8 4

Comes now the Defendant in the above styled cause and  
for answer to the complaint as heretofore filed says as  
follows:

1. Not guilty.
2. The general issues.

COLLINS, GALLOWAY & MURPHY

BY: James H. Lackey  
James H. Lackey  
ATTORNEYS FOR DEFENDANT

#### CERTIFICATE OF SERVICE

I do hereby certify that I have on this 6  
day of Oct. 1906, served a copy of the  
foregoing pleading on counsel for the parties to this  
proceeding by mailing the same by United States mail,  
properly addressed, and first class postage prepaid.

James H. Lackey

FILED

OCT 14 1906

WILLIAM L. DICK, CLERK  
REGISTER

COUNTY OF BALDWIN )

You are hereby commanded to summon GEORGE LEWIS, to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of Grace D. Booth.

WITNESS, this 19 day of Sept, 1966.

CLERK

DEFENDANT.

CASE NO. 7184

The Plaintiff claims of the Defendant the sum of TWENTY-FIVE THOUSAND (\$25,000.00) DOLLARS, as damages, for that heretofore and on, to-wit, November 7, 1965, the Defendant did so negligently operate a motor vehicle on U. S. Highway 90, at or near its intersection with Relham Drive, in Baldwin County, Alabama, at which point both of said roads are public roads in Baldwin County, Alabama, so as to cause said vehicle to collide with the vehicle

the Plaintiff was then and there in, and as a proximate result of the negligence of the Defendant as aforesaid, the Plaintiff was injured and damaged as follows: Her arms, neck, shoulder and back were bruised, contused and otherwise injured and damaged; she sustained an injury to her cervical spine resulting in the ligaments, muscles and other internal parts thereof being sprained, strained, pulled, torn and otherwise injured and damaged; Plaintiff was internally injured; and Plaintiff was permanently injured, hence this suit.

CUNNINGHAM, BOUNDS & BYRD  
ATTORNEYS FOR PLAINTIFF

BY: *Robert L. Byrd, Jr.*  
ROBERT L. BYRD, JR.

*John Duck*  
JOHN DUCK

Plaintiff demands a trial by jury.

*Robert L. Byrd, Jr.*  
ROBERT L. BYRD, JR.

Defendant may be served at:

P. O. Box S  
Robertsdale, Alabama

FILED

SEP 19 1966

JOHN A. DUCK, CLERK  
REGISTERED

*Unrecorded  
Sept 21, 1966*

7184

Grace H. Booth

vs-

George Lewis

FILED  
SEP 20 1946  
ALICE J. DICK, CLERK

Cunningham, Bernier & Co.  
Attorneys

Received 28 day of Sept. 1946  
and on 21 day of Sept 1946  
served a copy of the within. &c  
on George Lewis

by service on  
TAYLOR WILKINS, Sheriff  
By *Carl Childers* D. S.

R. H. Hill

Sheriff claims 50 miles at  
Ten Cents per mile Total \$5.00  
TAYLOR WILKINS, Sheriff  
BY *Carl Childers*  
DEPUTY SHERIFF