
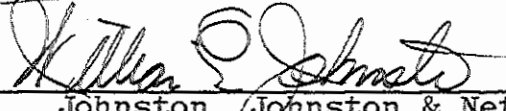


ERNEST LEE ROY LEE, : IN THE CIRCUIT COURT OF
 Plaintiff, : BALDWIN COUNTY, ALABAMA
 vs. : AT LAW
 WILLIE MAE STRAUSS and : NO. 7211
 BERTIE L. STRAUSS, :
 Defendants. :

Plaintiff claims of the defendants the sum of Ten Thousand and no/100 (\$10,000.00) Dollars as damages, for that heretofore on, to-wit, the 12th day of December, 1965, the defendant Bertie L. Strauss, while acting within the line and scope of her authority as an agent, servant or employee of the defendant Willie Mae Strauss, so negligently drove an automobile in a westwardly direction on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately one mile east of Robertsdale, Alabama, as to cause or allow the same to collide with an automobile which the plaintiff was driving in an eastwardly direction on said Highway 90 at said point, and the plaintiff says that as a proximate result of said negligence as aforesaid, said accident occurred, and the plaintiff suffered the following injuries and damages: two of his teeth were knocked out, he suffered injuries to his back and his knees, he was otherwise bruised, lacerated and damaged, all as a proximate result of the defendants' negligence as aforesaid, wherefore he brings this suit and seeks damages in the aforementioned amount.


 James Owens

 Johnston, Johnston & Nettles
 Attorneys for Plaintiff

Plaintiff demands trial by jury in the above cause.



FILED
 OCT 12 1966
 ALICE J. WILSON, CLERK
 BALDWIN COUNTY, ALABAMA

The Defendants are non-residents of the State of Alabama and reside in Florida, and did at the time of this accident, and the Plaintiff requests that they be served by serving the Secretary of State, as provided for in Title 7, Paragraph 199 of the Code of Alabama of 1940, as Recompiled.

The Defendant Willie Mae Strauss resides at:
1802 Derby Avenue
Auburndale, Florida

The Defendant Bertie L. Strauss resides at:
820 E. Oak Street
Lakeland, Florida

FILED
OCT 12 1962
ALICE L. BARKER, CLERK
REGISTERED

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7211

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Willie Mae Strauss and Bertie L. Strauss.....

.....
.....
.....

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.....

Willie Mae Strauss and Bertie L. Strauss....., Defendant.....

by Ernest Lee Roy Lee.....

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

Witness my hand this..... 12th..... day of..... October..... 1966.....

Oliver J. Week Clerk

8/10-13-66

480

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ERNEST LEE ROY LEE

Plaintiffs

vs.

WILLIE MAE STRAUSS &
BERTIE L. STRAUSS Defendants

SUMMONS AND COMPLAINT

Filed October 12, 1966

Alice J. Duck Clerk

Johnston, Johnston & Nettles

James R. Owen

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received in Office

OCT 12 1966

OCT 12 1966

TAYLOR WILKINS

M. S. BUTLER SHERIFF

I have executed this summons

this 19.....

by leaving a copy with

Executed by serving 2 copies of

the within on Raym Baggell

Secretary of State of The State of
Alabama.

This on 13 day of Oct. 1966

Sheriff of Baldwin County

M. S. Butler

By Romeo Arnold D.S.

The Sheriff claims \$1.00 travel ex-
pense on each of Two
processes of a total of \$ 2.00.

M. S. Butler, Sheriff

Montgomery County,

Alabama.

Sheriff

Deputy Sheriff

ERNEST LEE ROY LEE, : IN THE CIRCUIT COURT OF
Plaintiff : MOBILE COUNTY, ALABAMA
vs. : AT LAW
WILLIE MAE STRAUSS and :
BERTIE L. STRAUSS, :
Defendants. :
: CASE NO. 7211

A N S W E R

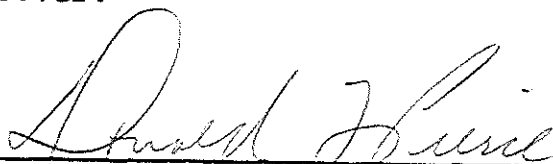
Comes now each of the defendants in the above-styled cause, Bertie L. Strauss and Willie Mae Strauss and for separate and several answer to each count of the complaint heretofore filed, sets down and assigns, separately and severally the following separate and several pleas:

ONE

Not guilty.

TWO

At the time and place alleged in the complaint, to-wit; December 12, 1965 the plaintiff, Ernest Lee Roy Lee did so negligently operate an automobile on Highway 90 in an eastwardly direction, said highway being a public highway in Baldwin County, Alabama, at a point approximately one mile east of Robertsdale, Alabama so as to cause or allow same to collide with an automobile in which the defendants were riding on said U. S. Highway 90 and as a direct and proximate result thereof plaintiff's negligence proximately contributed to the accident and his alleged injuries and damages; therefore plaintiff ought not recover.


Trial Attorney for Defendants

FILED

NOV 8 1965

RECEIVED

VOL 62 62 480 81
PAGE 101

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing Answer to James Owens, Esq. and William E. Johnston, Esq., Attorney for Plaintiff by depositing a copy of same in the United States Mail, postage prepaid, addressed to each said attorney at his respective office on this, the 2nd day of November, 1966.

Robert H. Hines

Defendants respectfully demand a trial by jury of this cause.

Robert H. Hines

October 17, 1966

ERNEST LEE ROY LEE, Plaintiff
VS
WILLIE MAE STRAUSS, et al, Defendants

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

CASE NO. 7211

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW:

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on October 13, 1966
I sent by certified mail in an envelope addressed as follows:

"

Willie Mae Strauss
1802 Derby Ave.
Auburndale, Fla."

"Certified Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

"

Willie Mae Strauss
1802 Derby Ave.
Auburndale, Fla.

You will take notice that on October 13, 1966 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: ERNEST LEE ROY LEE, Plaintiff VS WILLIE MAE STRAUSS, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 7211 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 13
day of October 1966

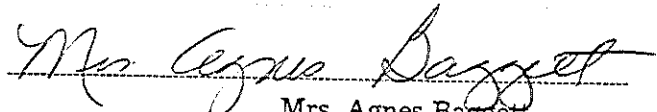
Enclosure (1)

(Signed) Mrs. Agnes Baggett
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed as above set forth had attached to it a true copy of the summons and complaint in the above-styled cause.

I further certify that on Oct 17 1966 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Auburndale, Fla.
on 15 Oct 66



WITNESS MY HAND and the Great Seal of the State of Alabama this the 17 day
of October 1966


Mrs. Agnes Baggett
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Hon. William E. Johnston
Van Antwerp Bldg.
Mobile, Ala.

ERNEST LEE ROY LEE,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
vs.	:	AT LAW
WILLIE MAE STRAUSS and	:	NO. <u>7211</u>
BERTIE L. STRAUSS,	:	
Defendants.	:	

Plaintiff claims of the defendants the sum of Ten Thousand and no/100 (\$10,000.00) Dollars as damages, for that heretofore on, to-wit, the 12th day of December, 1965, the defendant Bertie L. Strauss, while acting within the line and scope of her authority as an agent, servant or employee of the defendant Willie Mae Strauss, so negligently drove an automobile in a westwardly direction on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately one mile east of Robertsedale, Alabama, as to cause or allow the same to collide with an automobile which the plaintiff was driving in an eastwardly direction on said Highway 90 at said point, and the plaintiff says that as a proximate result of said negligence as aforesaid, said accident occurred, and the plaintiff suffered the following injuries and damages: two of his teeth were knocked out, he suffered injuries to his back and his knees, he was otherwise bruised, lacerated and damaged, all as a proximate result of the defendants' negligence as aforesaid, wherefore he brings this suit and seeks damages in the aforementioned amount.


James Owens

Johnston, Johnston & Nettles
Attorneys for Plaintiff

Plaintiff demands trial by jury in the above cause.



FILED
OCT 12 1965
CLERK
MADE I. BOWEN, REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7211

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Willie Mae Strauss and Bertie L. Strauss.....

.....
.....
.....

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.....

Willie Mae Strauss and Bertie L. Strauss....., Defendant.....

by Ernest Lee Roy Lee.....

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

Witness my hand this 12th day of October 1966.....

Alice J. Luck 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.....

Sheriff

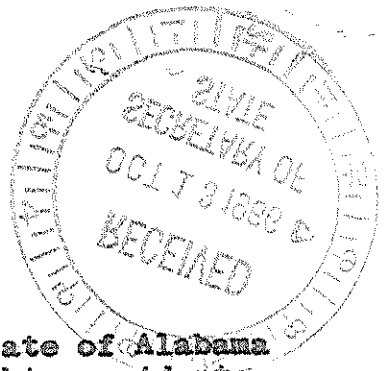
I have executed this summons

this 19.....

by leaving a copy with

Sheriff

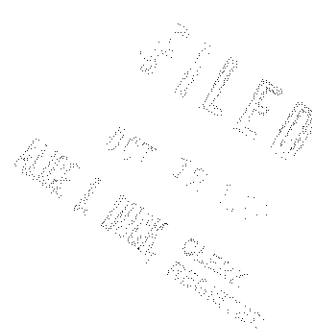
Deputy Sheriff



The Defendants are non-residents of the State of Alabama and reside in Florida, and did at the time of this accident, and the Plaintiff requests that they be served by serving the Secretary of State, as provided for in Title 7, Paragraph 199 of the Code of Alabama of 1940, as Recompiled.

The Defendant Willie Mae Strauss resides at:
1802 Derby Avenue
Auburndale, Florida

The Defendant Bertie L. Strauss resides at:
820 E. Oak Street
Lakeland, Florida



October 19, 1966

ERNEST LEE ROY LEE, Plaintiff
VS
BERTIE L. STRAUSS, et al, Defendants

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

CASE NO. 7211

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW:

I, Mrs. Agnes Baggett, Secretary of State, hereby certify that on October 13, 1966
I sent by certified mail in an envelope addressed as follows:

“

Bertie L. Strauss
820 E. Oak St.
Lakeland, Fla.”

“Certified Mail—
Return Receipt Requested
Deliver to Addressee Only”

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

“

Bertie L. Strauss
820 E. Oak St.
Lakeland, Fla.

You will take notice that on October 13, 1966 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: ERNEST LEE ROY LEE, Plaintiff VS BERTIE L. STRAUSS, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 7211 a true copy of which summons and complaint is attached hereto and the said service upon me as Secretary of State of the State of Alabama has the force and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 13
day of October 1966

Enclosure (1)

(Signed) Mrs. Agnes Baggett
Secretary of State”

I further certify that the notice above set out which was so mailed in the envelope addressed as above set forth had attached to it a true copy of the summons and complaint in the above-styled cause.

I further certify that on Oct 19 1966 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Auburndale, Fl
on Oct 17 1966

WITNESS MY HAND and the Great Seal of the State of Alabama this the 19 day
of October 1966


Mrs. Agnes Baggett
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Hon. William E. Johnston
Van Antwerp Bldg.
Mobile, Ala.

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7211

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Willie Mae Strauss and Bertie L. Strauss

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

Willie Mae Strauss and Bertie L. Strauss, Defendant

by Ernest Lee Roy Lee

Plaintiff

Witness my hand this 12th day of October, 1966

Alice J. Haddock 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.....

Sheriff

I have executed this summons

this 19.....



by leaving a copy with

Sheriff

Deputy Sheriff

ERNEST LEE ROY LEE, : IN THE CIRCUIT COURT OF
 Plaintiff, : BALDWIN COUNTY, ALABAMA
 vs. : AT LAW
 WILLIE MAE STRAUSS and : NO. 2211
 BERTIE L. STRAUSS, :
 Defendants. :

Plaintiff claims of the defendants the sum of Ten Thousand and no/100 (\$10,000.00) Dollars as damages, for that heretofore on, to-wit, the 12th day of December, 1965, the defendant Bertie L. Strauss, while acting within the line and scope of her authority as an agent, servant or employee of the defendant Willie Mae Strauss, so negligently drove an automobile in a westwardly direction on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately one mile east of Robertsdale, Alabama, as to cause or allow the same to collide with an automobile which the plaintiff was driving in an eastwardly direction on said Highway 90 at said point, and the plaintiff says that as a proximate result of said negligence as aforesaid, said accident occurred, and the plaintiff suffered the following injuries and damages: two of his teeth were knocked out, he suffered injuries to his back and his knees, he was otherwise bruised, lacerated and damaged, all as a proximate result of the defendants' negligence as aforesaid, wherefore he brings this suit and seeks damages in the aforementioned amount.


 James Owens

 Johnston, Johnston & Nettles
 Attorneys for Plaintiff

Plaintiff demands trial by jury in the above cause.



FILED
 OCT 12 1965
 JAMES L. MOORE, CLERK
 BALDWIN COUNTY, ALABAMA

The Defendants are non-residents of the State of Alabama and reside in Florida, and did at the time of this accident, and the Plaintiff requests that they be served by serving the Secretary of State, as provided for in Title 7, Paragraph 199 of the Code of Alabama of 1940, as Recompiled.

The Defendant Willie Mae Strauss resides at:
1802 Derby Avenue
Auburndale, Florida

The Defendant Bertie L. Strauss resides at:
820 E. Oak Street
Lakeland, Florida

FILED
OCT 11 1950
ALABAMA DEPT. OF JUSTICE