STATE OF ALABAMA ) \* BALDWIN COUNTY ) TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mira McKay Byrd and Ralph E. Watson to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Joe Raymond Subel.

WITNESS my hand on this Ind day of November, 1966.

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The address of Mira McKay Byrd is P. O. Box 258, Foley, Alabama. The address of Ralph E. Watson is Robertsdale, Alabama.

JOE RAYMOND SUBEL,

Plaintiff, VS. MIRA McKAY BYRD and RALPH E. WATSON, Defendants.

> C O M P L A I N T COUNT ONE

Plaintiff claims of the defendant, Mira McKay Byrd, the sum of Three Hundred Dollars (\$300.00) for that heretofore on to-wit, May 23, 1966, at a point where Alabama Highway 59 intersects Woodlawn Road which point is approximately two miles south of the city limits of Robertsdale, Baldwin County, Alabama, the said defendant so negligently operated a motor vehicle as to cause it to run into, upon or against the motor vehicle of the plaintiff, which he was driving then and there at said time and place where he had a right to be and as a proximate result of the negligence of the said defendant the plaintiff's motor vehicle was bent, broken and damaged as follows: his right front fender was bent; his right front door assembly was bent and damaged; the body and floor panel of his motor vehicle was damaged; his right front wheel was bent; the front end of his motor vehicle was bent and much paint was scratched therefrom, all to the damage of the plaintiff aforesaid, hence this suit. COUNT TWO

Plaintiff claims of the defendants Three Hundred Dollars (\$300.00) for that heretofore on to-wit, May 23, 1966, at a point where Alabama Highway 59 intersects Woodlawn Road at a point approximately two miles south of the city limits of Robertsdale, Baldwin County, Alabama, the defendant, Mira McKay Byrd, who was at said time and place an agent, servant or employee of the defendant, Ralph E. Watson, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated a motor vehicle as to cause it to run into, upon or against the motor vehicle of the plaintiff which was being driven by the said plaintiff at said time and place and where he had a right to be and as a proximate result of the negligence of the said defendant, Mira McKay Byrd, who was then and there an agent, servant or employee of the defendant, Ralph E. Watson, acting within the line and scope of her authority as such agent, servant or employee, plaintiff's motor vehicle was damaged as follows: his right front fender was bent; his right front door assembly was bent and damaged; the body and floor panel of his motor vehicle was damaged; his right front wheel was bent; the front end of his motor vehicle was bent and much paint was scratched therefrom. Plaintiff avers that all of his damages were caused as a proximate result of the negligence of the defendant, Mira McKay Byrd, at the time and place aforesaid. who was then and there acting as the agent, servant or employee of the defendant, Ralph E. Watson, and who was acting within the line and scope of her authority as such agent, servant or employee at said time and place, hence this suit.

J. B. BLACKEURN and JAMES R. OWEN

Attorneys

for Plaintiff

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STATE OF ALABAMA ) \* BALDWIN COUNTY ) TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mira McKay Byrd and Ralph E. Watson to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Joe Raymond Subel.

WITNESS my hand on this \_\_\_\_\_ day of November, 1966.

COMPLAINT

## COUNT ONE

Plaintiff claims of the defendant, Mira McKay Byrd, the sum of Three Hundred Dollars (\$300.00) for that heretofore on to-wit, May 23, 1966, at a point where Alabama Highway 59 intersects Woodlawn Road which point is approximately two miles south of the city limits of Robertsdale, Baldwin County, Alabama, the said defendant so negligently operated a motor vehicle as to cause it to run into, upon or against the motor vehicle of the plaintiff, which he was driving then and there at said time and place where he had a right to be and as a proximate result of the negligence of the said defendant the plaintiff's motor vehicle was bent, broken and damaged as follows: his right front fender was bent; his right front door assembly was bent and damaged; the body and floor panel of his motor vehicle was damaged; his right front wheel was bent; the front end of his motor vehicle was bent and much paint was scratched therefrom, all to the damage of the plaintiff aforesaid, hence this suit.

## COUNT TWO

Plaintiff claims of the defendants Three Hundred Dollars (\$300.00) for that heretofore on to-wit, May 23, 1966, at a point where Alabama Highway 59 intersects Woodlawn Road at a point approximately two miles south of the city limits of Robertsdale, Baldwin County, Alabama, the defendant, Mira McKay Byrd, who was at said time and place an agent, servant or employee of the defendant Ralph E. Watson, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated a motor vehicle as to cause it to run into, upon or against the motor vehicle of the plaintiff which was being driven by the said plaintiff at said time and place and where he had a right to be and as a proximate result of the negligence of the said defendant, Mira McKay Byrd, who was then and there an agent, servant or employed of the defendant, Ralph E. Watson, acting within the line and scope of her authority as such agent, servant or employee, plaintiff's motor vehicle was damaged as follows: his right front fender was bent; his right front door assembly was bent and damaged; the body and floor panel of his motor vehicle was damaged; his right front wheel was bent; the front end of his motor vehicle was bent and much paint was scratched therefrom. Plaintiff avers that all of his damages were caused as a proximate result of the negligence of the defendant, Mira McKay Byrd, at the time and place aforesaid, who was then and there acting as the agent, servant or employee of the defendant, Ralph E. Watson, and who was acting within the line and scope of her authority as such agent, servant or employee at said time and place, hence this suit.

J. B. BLACKBURN and JAMES R. OWEN

Attorneys for Plaintiff

STATE OF ALABAMA ) \* BALDWIN COUNTY ) TO ANY SHERIFF OF THE STATE OF ALABAMA:

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WITNESS my hand on this Jan day of November, 1966.

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The address of Mira McKay Byrd is P. O. Box 258, Foley, Alabama. The address of Ralph E. Watson is Robertsdale, Alabama.

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JOE RAYMOND SUBEL,

VS.

Plaintiff,

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MIRA McKAY BYRD and RALPH E. WATSON, IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW 724/

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Defendants.

COMPLAINT COUNT ONE

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J. B. BLACKBURN and JAMES R. OWEN

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JOE RAYMOND SUBEL,	1	
PLAINTIFF	r I	IN THE CIRCUIT COURT OF
VS	E	BALDWIN COUNTY, ALABAMA
MIRA McKAY BYRD and	ň	AT LAW
RALPH E. WATSON,	x v	
DEFENDANTS	Ĭ	NO. 7241
	I	

## PLEAS

Comes now the Defendant in the above styled cause, Ralph E. Watson, and for answer to the Bill of Complaint says as follows:

> l. Not guilty.

> > 2.

Not guilty.

WILTERS, BRANDLEY & NESBIT By Ralph E. Attorney for Watson Defendant, Ralph E. Watson, demands a trial by jury. By: NOV SQ 1966 STERN Georgen 

## CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29 day of MMMMMer 19/4 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage p.ep.id.

WILTERS, BRANTLEY & NESBIT By:

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BALDWIN COUNTY, ALABAMA AT LAW

JOE RAYMOND SUBEL, Plaintiff

Vs

MIRA McKAY BYRD and RALPH E. WATSON, Defendants

PLEAS

J. B. BLACKBURN and JAMES R. OWEN, Plaintiff's attorney

WILTERS, BRANTLEY & NESBIT Defendants attorney

19.15

J. B. BLACKBURN ATTORNEY AT LAW 110 COURTHOUSE SQUARE BAY MINETTE, ALABAMA 36507

September 19, 1967

P. 0. DRAWER 59 TEL. 937-2061 AREA CODE 205

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

Dear Mrs. Duck:

Please dismiss the case of Joe Raymond Subel, Plaintiff, vs. Mira McKay Byrd and Ralph E. Watson, Defendants, which is pending in the Circuit Court, at Law, No. 7241.

Also, send me a costs bill in connection with this case.

Yours very truly,

JAMES R. OWEN

JRO/ers