

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 3rd day of November, 1966.

Alice J. Luck  
Clerk

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.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

7241

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 Robertsedale, 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. BLACKBURN and  
JAMES R. OWEN

By   
Attorneys for Plaintiff

FILED

NOV 3 1966

ALICE L. DUCK, CLERK  
REGISTER

RECEIVED  
APR 1 1934

APR 3 1934

FILED

RECORDED FOR FILING  
BY 

JAMES H. O'NEAL  
J. B. BRIDGEMAN and

said time and place, hence the suit.

and scope of her authority as such agent, servant or employee of the defendant, Ralph B. Watson, and who was acting within the time who was then and there acting as the agent, servant or employee of the defendant, Mrs McKay Byrd, at the time and place aforesaid, his damages were caused as a proximate result of the negligence of such being the attached character. Plaintiff avers that all of which was done; the front end of his motor vehicle was bent and and floor board of his motor vehicle was damaged; his right front door; his right front door assembly was bent and damaged; the body motor vehicle was damaged as follows: his right front fender was of her authority as such agent, servant or employee, Plaintiff's of the defendant, Ralph B. Watson, acting within the time and scope

Mr. Ball  
Mrs McKay Byrd  
90 Racket Club

781 Telegraph Rd  
Not Enlarged

proximate result of the negligence of the said defendant, at said time and place and where he had a right to be of the plaintiff which was being driven by the said as to cause it to run into, upon or against the motor agent, servant or employee, so negligently operated a motor person, acting within the time and scope of her authority, at said time and place as agent, servant or employee of the defendant, Ralph B. Watson, the defendant, Mrs McKay Byrd, who was approximately two miles south of the city limits of Hopedale, where Alabama Highway 30 intersects Woodman Road at a point (\$300.00) for that heretofore on or about May 23, 1930, at a point Plaintiff claims of the defendant's three hundred dollars COUNT TWO from, all to the damage of the plaintiff aforesaid, hence this suit. of his motor vehicle was bent and much being scratched there. vehicle was damaged; his right front wheel was bent; the front end

STATE OF ALABAMA )  
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BALDWIN COUNTY )

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

Clerk

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,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
MIRA MCKAY BYRD and	)	AT LAW
RALPH E. WATSON,	)	
	)	7241
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 Robertsedale, 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. BLACKBURN and  
JAMES R. OWEN

By \_\_\_\_\_  
Attorneys for Plaintiff

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

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WITNESS my hand on this 3rd day of November, 1966.

Alvin J. Puck  
Clerk

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The address of Ralph E. Watson is Robertsdale, Alabama.

\* \* \* \* \*

JOE RAYMOND SUBEL,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
MIRA MCKAY BYRD and	)	AT LAW
RALPH E. WATSON,	)	<u>7241</u>
	)	
Defendants.	)	

C O M P L A I N T  
COUNT ONE


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J. B. BLACKBURN and  
JAMES R. OWEN

By   
Attorneys for Plaintiff

FILED  
NOV 8 1966  
ALICE L. DICK, CLERK  
REGISTER

M. F.

5643  
Case No. 7241

3 NOV. 66

Mira McKay Byrd  
Ralph E. Watson  
Nov. 5. 1966

Joe Raymond Zubei  
Plaintiff

TAYLOR WILKINS, Sheriff  
By 177 Hall

vs.  
Mira McKay Byrd  
& Ralph E. Watson

RETURNED 11-14-66  
Not found in my County after diligent search and inquiry.  
Mira McKay Byrd.  
RAY D. BRIDGES, Sheriff  
By L.B. Smith D. S.

Mira Byrd  
works at  
Rochester Club  
Prichard 50

5.00  
H. J. Hall  
DEPUTY SHERIFF

FILED  
NOV 3 1966  
ALICE A. DUCK, CLERK  
REGISTRY  
NOV 3 8 55 AM '66  
REC'D. SHERIFF DEPT.  
MOBILE COUNTY, ALA.

J. B. Blackburn  
James R. Udden



JOE RAYMOND SUBEL,

PLAINTIFF

VS

MIRA McKAY BYRD and  
RALPH E. WATSON,

DEFENDANTS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7241

PLEAS

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

1.

Not guilty.

2.

Not guilty.

WILTERS, BRANTLEY & NESBIT

By: *Thyler S. Nesbit*

Attorney for Ralph E. Watson

Defendant, Ralph E. Watson,  
demands a trial by jury.

By: *Thyler S. Nesbit*

FILED

NOV 30 1966

WALTER L. DICK, CLERK  
REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29<sup>th</sup> day of November  
1966 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 prepaid.

WILTERS, BRANTLEY & NESBIT

By: *Thyler S. Nesbit*

No. 7241

IN THE CIRCUIT COURT OF  
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

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

September 19, 1967

P. O. 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