

LAW OFFICES OF
HOWELL, JOHNSTON, LANGFORD & FINKBOHNER
NINTH FLOOR, WATERMAN BUILDING
P. O. BOX 1652
MOBILE, ALABAMA
36601

THOMAS O. HOWELL, JR.
THOMAS A. JOHNSTON, III
IRVIN J. LANGFORD
GEORGE W. FINKBOHNER, JR.
JOHN L. LAWLER

AREA CODE 205
TELEPHONE 432-2677

September 12, 1967

Clerk, Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: R. A. Thomas
vs.
James Hoffman Fuller
Case No. 7484
Rosalee B. Thomas
vs.
James Hoffman Fuller
Case No. 7525

Gentlemen:

Please be advised that Mr. John Earl Chason, Attorney for the Plaintiff in the above cases, and I have entered into the following agreement.

That a judgment by consent be entered in Case No. 7484, wherein Mr. Chason's client claims property damage in the amount of \$475.00, and that a judgment by consent be entered in the amount of \$400.00 by consent in Case No. 7525 wherein Mr. Chason's client has claimed personal injury.

Very truly yours,

HOWELL, JOHNSTON, LANGFORD & FINKBOHNER


John L. Lawler

JLL/nfl

cc: Honorable John E. Chason
Chason, Stone & Chason
Attorneys at Law
P. O. Box 120
Bay Minette, Alabama

Mr. James H. Fuller
3432 East Gulfwood Drive
Mobile, Alabama

R. A. THOMAS,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs.) AT LAW
JAMES HOFFMAN FULLER,)
Defendant.) CASE NO. 7484

Comes now the Defendant, JAMES HOFFMAN FULLER, in the above styled cause and for answer to the complaint heretofore filed, saith as follows:

1. The matters alleged therein are untrue.
2. The general issue.
3. Not guilty.

HOWELL, JOHNSTON, LANGFORD & FINKBOHNER,
Attorneys for the Defendant.

By: *John L. Lawler*
John L. Lawler

Defendant respectfully requests a trial by jury.

HOWELL, JOHNSTON, LANGFORD & FINKBOHNER,
Attorneys for the Defendant.

By: *John L. Lawler*
John L. Lawler

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY THAT I HAVE ON
THIS 4 DAY OF May, 1967
SERVED A COPY OF THE FOREGOING PLEADING
ON COUNSEL FOR ALL PARTIES TO THIS PRO-
CEEDING BY MAILING THE SAME BY UNITED
STATES MAIL, PROPERLY ADDRESSED, AND
FIRST CLASS POSTAGE PREPAID.

John L. Lawler

FILED

MAY 5 1967

CLERK

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James Hoffman Fuller 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 same, then and there to answer the Complaint of R.A. Thomas.

Witness my hand this 17th day of April, 1967.

Alice J. Duck
Clerk

R.A. Thomas,

Plaintiff,

vs.

James Hoffman Fuller,

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

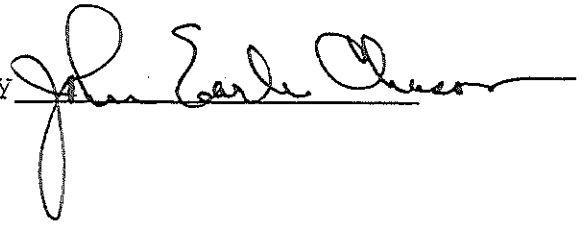
7484

COMPLAINT

The Plaintiff claims of the Defendant the sum of Four Hundred Seventy Five Dollars (\$475.00), as damages, for that, heretofore on to-wit: the 17th day of December, 1966, at a point on U.S. Highway 90 approximately one mile north of Robertsdale in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to Plaintiff, and as a proximate result of such negligence the Plaintiff's automobile was damaged in that its rear bumper, right rear fender, and its right rear taillight were bent, damaged or broken, the rear deck was bent and its frame was bent, all to the damage of the

plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By 

Defendant may be served
at: 3432 East Gulfwood Drive
Mobile, Alabama

FILED
APR 17 1962
ALICE L. JONES, CLERK
REGISTERED

RECEIVED

APR 18 1967

JAYLOR WILKINS
SHERIFF

Received 19 Day of April 1967
and on 20 Day of April 1967
I served a Copy of the within James Hoffman Fuller
on James Hoffman Fuller
by service on _____
RAY D. BRIDGES, Sheriff
R. A. Thomas, D. S.

REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.
APR 19 8 40 AM '67

26 4/18/67
67-70#7484
R. A. THOMAS,
Plaintiff,
vs.
JAMES HOFFMAN FULLER,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND BILL OF COMPLAINT

FILED
APR 17 1967
ALICE A. DICK, CLERK
CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA