

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE Bay Minette, Ala.

Re: Lester Tillman vs. Etta Mae Hilburn

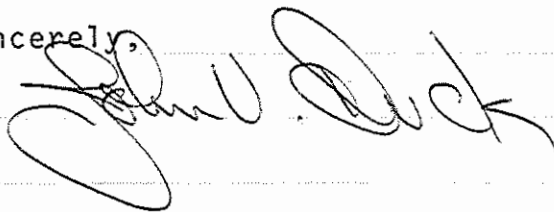
Civil No. 7492

Dear Mrs. Duck:

Please have captioned suit dismissed and
forward the cost bill to Chason, Stone
& Chason, Attn: Mr. John Chason.

Thank you.

Sincerely,



SIGNED

DATE

SIGNED

JOHN V. DUCK
~~DUCK & LACY~~
Attorneys at Law

P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

7492

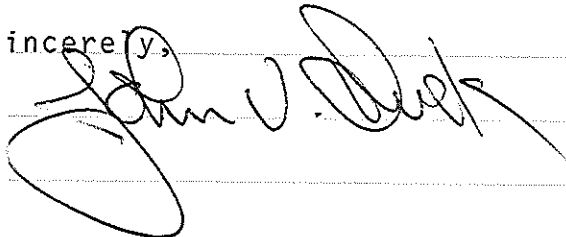
DATE April 24, 1967

Re: Lester Tillman, vs. ETTA MAE HILBURN

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed, together with copy of same and
Summons to be served.

Sincerely,



SIGNED

SIGNED

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7492

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonETTA MAE HILBURN

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.....

.....ETTA MAE HILBURN....., Defendant.....

byLESTER TILLMAN

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

Witness my hand this.....

26th

day of.....

April 1967

Oliver J. Luck Clerk

Ex. 6-2-67

200

No. 7492

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LESTER TILLMAN

Plaintiffs

vs.

ETTA MAE HILBURN

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

APR 26 1967

Clerk

ALICE L. DUCK, CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

RECEIVED

Received In Office

APR 26 1967

19.....

TAYLOR WILKINS

Sheriff

Sheriff

I have executed this summons

this June 2, 1967

by leaving a copy with

Etta Mae Hilburn
L. Hise

70
70
TAYLOR WILKINS
Roy Randall

Taylor Wilkins Sheriff
Roy Randall Deputy Sheriff

LESTER TILLMAN,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

X

ETTA MAE HILBURN,

X

AT LAW

Defendant.

X

Comes the Defendant in the above styled cause and for
plea to the Complaint filed in said cause, says:

1. Not guilty.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing
pleading has been served upon counsel
for all parties to this proceeding, by
mailing the same to each by First Class
United States Mail, properly addressed
and postage prepaid on this 12 day

of June, 1967

[Signature]

[Signature]
Attorneys for Defendant

FILED

JUN 12 1967

ALICE L. BUCK, CLERK
REGISTER

LESTER TILLMAN,

Plaintiff,

vs.

ETTA MAE HILBURN,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

PLEA

* * * * *

JUN 12 1967

WILLIAM L. HICK, CLERK
REGISTRY

LESTER TILLMAN,)
 Plaintiff,)
vs.)
ETTA MAE HILBURN,)
 Defendant.)

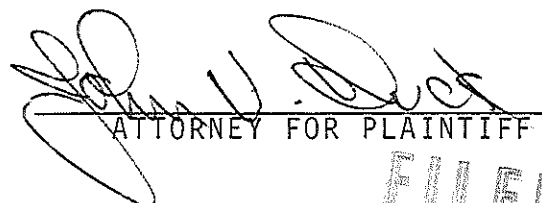
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

7492

Plaintiff claims of the Defendant the sum of TWENTY-FIVE THOUSAND (\$25,000.00) DOLLARS as damages, for that, heretofore on, to-wit: the 24th day of November, 1966, the Plaintiff was riding as a passenger in an automobile on a public highway, viz: Alabama Highway No. 104 at it's intersection with County Highway No. 27, which was then and there a public highway in Baldwin County, Alabama, where the Plaintiff had a right to be, and the Defendant, ETTA MAE HILBURN, so negligently operated a motor vehicle then and there, as to cause said motor vehicle she was operating to run over, upon or against the automobile in which the Plaintiff was then and there riding; and the Plaintiff avers that as a proximate consequence thereof he was injured in that his spleen was ruptured, and had to be removed; that he suffered a deep stab wound in the upper left part of his chest; that he suffered contusions, abrasions and lacerations, and that he suffered great pain and mental anguish; that he was forced to lose time from his employment; that he was called to expend large sums of money in and about the treatment of his injuries for doctors, nurses and hospitals; and that he was permanently injured, all of which damages were received by the Plaintiff in the sum aforesaid; and Plaintiff avers that all of his damages were proximately caused by the said negligence of the said Defendant, ETTA MAE HILBURN, in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid, hence this suit.

Plaintiff respectfully demands
a Trial by Jury.


ATTORNEY FOR PLAINTIFF


ATTORNEY FOR PLAINTIFF

193

FILED

APR 26 1967

ALICE L. BUCK, CLERK
REGISTERED