

MARTHA V. SIVER, : IN THE CIRCUIT COURT OF BALDWIN  
Plaintiff, : COUNTY, ALABAMA  
VS: : AT LAW  
DAVID KEITH LEGGETT, :  
Defendant : CASE NO. 7796

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE THOUSAND AND 00/100 (\$5,000.00) DOLLARS as damages for that heretofore and on to-wit, March 3, 1967, the Plaintiff was a passenger in an automobile being operated upon and along Alabama State Highway 59, at a point at or near its intersection with Baldwin County Highway No. 46, at which point both said highways are public highways in Baldwin County, Alabama, and Plaintiff avers that the Defendant then and there negligently operated a motor vehicle as to cause the automobile in which the plaintiff was riding to be thrown or to skid from, or to be forced from said public road; and Plaintiff avers that as a proximate consequence of the aforesaid negligence of the Defendant the automobile in which the Plaintiff was then and there riding was caused to overturn and the Plaintiff was injured in that, to-wit: she was rendered unconscious, she was bruised and made sore, she was made sick, sore and lame, she was caused to expend sums of money in and about her own care and treatment, and she was permanently injured, all for which the Plaintiff sues.

COLLINS, GALLOWAY & MURPHY

BY:

James H. Lackey  
James H. Lackey  
ATTORNEYS FOR PLAINTIFF

Defendant's Address:

Route 1, Box 216

Robertsdale, Alabama

FILED

OCT 23 1967

ALICE J. DUCK CLERK  
REGISTER

TOT

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7796

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

DAVID KEITH LEGGETT

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

DAVID KEITH LEGGETT

Defendant

by MARTHA SIVER

Plaintiff

Witness my hand this 23 day of Oct. 19 67

*W. J. Smith*, Clerk

No. 1796

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Martha V. Silver

Plaintiffs

vs.

David Keith Leggett

Defendants

SUMMONS AND COMPLAINT

Filed 10-23 1967

Alice J. Leuck Clerk

Collins, Galloway & Murphy

Plaintiff's Attorney

Defendant's Attorney

RECEIVED

FEB 19 1968  
Defendant lives at

TAYLOR WILKINS  
SHERIFF  
RECEIVED

Received in Office

OCT 23 1967

TAYLOR WILKINS  
SHERIFF

I have executed this summons

this

by leaving a copy with

21 day  
found in my county after diligent search and in-  
Taylor Wilkins, Sheriff

By [Signature]  
in U.S. ARMY/67  
Deputy Sheriff

30 day  
not found in my county after diligent search and in-  
[Signature]  
in U.S. ARMY/67  
Deputy Sheriff

Sheriff

Deputy Sheriff

103

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7796

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

~~DAVID KEITH LEGGETT~~

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

~~DAVID KEITH LEGGETT~~

Defendant

by ~~MARTHA SIVER~~

Plaintiff

Witness my hand this 23 day of Oct. 19 67.

*Christina*, 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

COLLINS, GALLOWAY & MURPHY  
ATTORNEYS AT LAW  
958 DAUPHIN STREET  
MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
JAMES H. LACKEY

February 15, 1968

P. O. BOX 4492  
TELEPHONE  
432-0568  
AREA CODE 205

Mrs. Alice Duck, Clerk  
Circuit Court  
Baldwin County Court House  
Bay Minette, Alabama

Re: Martha V. Siver  
vs: David Keith Leggett  
Case No. 7796

Dear Mrs. Duck:

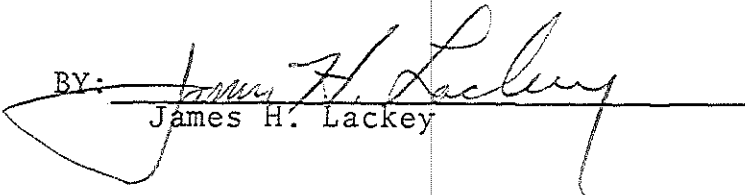
Would you please issue an alias complaint and summons to be served upon the defendant at Route 1, Box 216, Robertsdale, Alabama. This is the same address as listed on the summons and complaint, but it is our information that the defendant lives at this address. In case the Sheriff is having trouble finding this location, it is our information that the defendant's residence may be located by proceeding east on Highway 90 from Robertsdale, Alabama to the community of Elsanor. Turn right on the road just before you get to the Elsanor Elementary School and the defendant's residence is approximately three miles on the right.

Thank you very much.

Sincerely yours,

COLLINS, GALLOWAY & MURPHY

BY:

  
James H. Lackey

JHL/brm

COLLINS, GALLOWAY & MURPHY  
ATTORNEYS AT LAW  
958 DAUPHIN STREET  
MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
JAMES H. LACKEY

October 20, 1967

P. O. BOX 4492  
TELEPHONE  
432-0568  
AREA CODE 205

Mrs. Alice Duck, Clerk  
Circuit Court  
Baldwin County Court House  
Bay Minette, Alabama

NO. 7796

Re: Martha B. Siver  
vs: David Keith Leggett

Dear Mr. Duck:

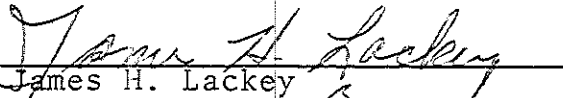
Would you please file the enclosed suit in your Court,  
and notify me that same has been filed.

Thank you very much.

Sincerely yours,

COLLINS, GALLOWAY & MURPHY

BY:

  
James H. Lackey

JHL/brm

Encl.

COLLINS, GALLOWAY & MURPHY  
ATTORNEYS AT LAW  
958 DAUPHIN STREET  
MOBILE, ALABAMA 36604

FRED G. COLLINS  
THOMAS M. GALLOWAY  
M. THOMAS MURPHY (1924-1956)  
JAMES H. LACKEY

P. O. BOX 4492  
TELEPHONE  
432-0568  
AREA CODE 205

April 3, 1963

Mrs. Alice Duck, Clerk  
Circuit Court  
Baldwin County Court House  
Bay Minette, Alabama

Re: Martha V. Siver  
vs: David Keith Leggett  
Case No. 7796

Dear Mrs. Duck:

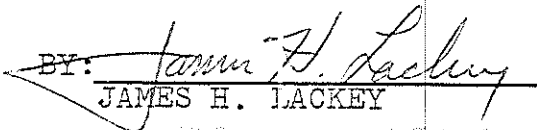
Would you please non-suit the above captioned matter  
at the request of the Plaintiff, and forward a costs bill  
to me.

Thank you very much.

Sincerely,

COLLINS, GALLOWAY & MURPHY

BY:

  
JAMES H. LACKEY

JHL/mle