



MABEL AMOS
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY, ALABAMA 36104
April 1, 1968

Honorable Warren L. Finch
963 Old Shell Road
Mobile, Alabama 36604

Dear Mr. Finch:

791 m

JEANELL C. BARTLETT, Plaintiff VS
Re: PERCY LEE MELTON, Defendant

Please refer to your file in the above-styled cause and be advised that on March 6, 1968, I sent by certified mail return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Percy Lee Melton
Route 2, Box 222
Bogalusa, Louisiana 70427

On April, 1968, this letter (Certified No. 51439) was returned to me with reason for non-delivery given as "UNCLAIMED".

If you would like to further pursue service on this defendant, according to the provisions of Title 7, Section 199, an additional \$2 deposit will enable me to attempt personal service by local law enforcement officers.

Will you please advise me as to any further steps you wish me to take in perfecting this service.

Very truly yours,

Mabel S. Amos
Secretary of State

fc

CC: Honorable Alice J. Duck, Clerk
✓ Circuit Court of Baldwin County
Bay Minette, Alabama 36507



MABEL AMOS
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY, ALABAMA 36104
February 25, 1969

Honorable Warren L. Finch
P. O. Box 4453
Mobile, Alabama 36604

Dear Mr. Finch:

Re: JEANELL C. BARTLETT, Plaintiff VS
PERCY LEE MELTON, Defendant

Please refer to your file in the above-styled cause and be advised that on January 30, 1969, I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Percy Lee Melton
Route 2, Box 222
Bogalusa, La.

On February 24, 1969, this letter (Certified No. 53787) was returned to me with reason for non-delivery given as "UNCLAIMED".

If you would like to further pursue service on this defendant, according to the provisions of Title 7, Section 199, an additional \$2.00 deposit will enable me to attempt personal service by local law enforcement officers.

Will you please advise me as to any further steps you wish me to take in perfecting this service.

Very truly yours,

fc

Mabel S. Amos
Secretary of State

CC: Honorable Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama 36507

JEANELL C. BARTLETT
Plaintiff

IN THE CIRCUIT COURT OF

VERSUS

BALDWIN COUNTY, ALABAMA

PERCY LEE MELTON

Defendant

CASE NO. 7915

JUDGMENT DISMISSING SUIT

This matter came on for trial pursuant to
previous assignment:

PRESENT: Jeanell C. Bartlett, Plaintiff,
failing to appear, either
personally or through her
attorney, and,

Percy Lee Melton, individually
and through his attorney,
Donald H. Lee.

The Court after calling the case for trial on
three consecutive occasions and Plaintiff failing to appear
or give any lawful cause why the matter was not to be heard,

IT IS ORDERED that this cause be dismissed for
Order of Prosecution and at Plaintiff's cost.

JUDGMENT RENDERED March 11, 1970.

JUDGMENT READ AND SIGNED this the 17th day of

July, 1970.

Jeffrey G. MacArthur
J U D G E

JEANELL C. BARTLETT

Plaintiff

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

VS.

PERCY LEE MELTON

Defendant

CASE NO.

7915

COUNT ONE

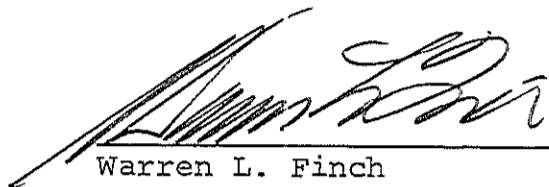
Plaintiff claims of the defendant One Hundred Thousand Dollars (\$100,000.00) damages for that on to-wit: the 19th day of May, 1967, at to-wit: Loxley, Baldwin County, Alabama on Highway 90, a public road in the County of Baldwin, State of Alabama the defendant negligently ran into, upon and against the automobile in which the plaintiff was a passenger and as a proximate result of said negligence the plaintiff was caused injury suffering bruises, contusions and abrasions about her body.

Plaintiff has been caused to expend monies for doctors and medical bills and ambulance services and drugs and caused much pain and suffering and much anxiety, hence this suit.

COUNT TWO

Plaintiff claims of the defendant One Hundred Thousand Dollars (\$100,000.00) damages, for that on to-wit: the 19th day of May, 1967, at to-wit: Loxley, Baldwin County, Alabama, on Highway 90, a public road in the County of Baldwin, State of Alabama, the defendant wantonly ran into, upon and against the automobile in which the plaintiff was a passenger and as a proximate result of said willfulness the plaintiff was caused injury suffering bruises, contusions and abrasions about her body.

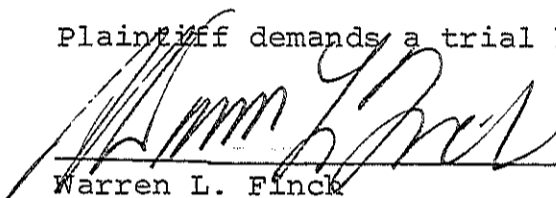
Plaintiff has been caused to expend monies for
doctors and medical bills and ambulance services and
drugs and caused much pain and suffering and much anxiety,
hence this suit.



Warren L. Finch
Attorney for the Plaintiff

Defendant's address is:
Rt2, Box 222
Bogalusa, Louisiana

Plaintiff demands a trial by jury.



Warren L. Finch
Attorney for Plaintiff

FILED

DEC 14 1967

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 7915

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonPercy Lee Melton.....

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.....

.....Percy Lee Melton....., Defendant.....

byJeanelle C. Bartlett.....

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

Witness my hand this.....14th.....day of.....December.....1967.....

.....Alice J. Duck.....Clerk

24
3-6-68

No. 7915.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JEANELL G. BARTLETT

Plaintiffs

vs.

PERCY LEE MELTON

Defendants

SUMMONS AND COMPLAINT

Filed Dec. 14, 1968

Alice J. Duck Clerk

WARREN L. FINCH

Plaintiff's Attorney

Defendant's Attorney

1802
Defendant lives at
RECEIVED IN OFFICE

RECEIVED
Received In Office
M. S. BUTLER, 1968 III

TAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Executed by serving 3 copies of
the within on Noble Amos
Secretary of State of The State of
Alabama

This the 16 day of March, 1968

Sheriff of Montgomery County.....

M. S. Butler,

By W. L. Mason, D. A.

M. S. Butler, Sheriff of Montgomery
County, Alabama, Claim \$1.50 each for
serving 2 process(es) and \$1.00

travel expense on each of 1 Sheriff
process(es) or a total of \$2.50
Deputy Sheriff

W. L. Mason Deputy Sheriff

SEAL, LEE, FENDLASON & BRANCH
ATTORNEYS AND COUNSELLORS AT LAW

WELTON D. SEAL
DONALD H. LEE
DONALD M. FENDLASON
DALE E. BRANCH

319 MEMPHIS STREET
BOGALUSA, LOUISIANA
70427

AREA CODE 504
732-4258

October 16, 1969

Clerk, Circuit Court
Baldwin County
Mobile, Alabama

Re: Jeanell C. Bartlett
Versus
Percy Lee Melton
Case No. 7915

Dear Sir:

Please find enclosed original and copy of this answer in the above named and styled suit. Please file this answer and return to us the certified copy showing the filing data thereon.

✓ We further request that you notify Mr. Percy Lee Melton, Route 1, Box 149, Bogalusa, Louisiana, and us, of any trial or hearing on this matter.

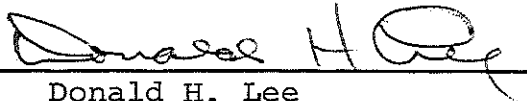
Should you have any costs, please bill us.

We have already mailed a copy of this answer to Attorney Warren L. Finch, P. O. Box 4453, Mobile, Alabama.

Cordially,

SEAL, LEE, FENDLASON & BRANCH

BY:


Donald H. Lee

DHL: fcm
Enclosures

Please mail certified copy -

JEANELL C. BARTLETT

Plaintiff

VERSUS

PERCY LEE MELTON

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

CASE NO. 7915

A N S W E R

NOW into Court appearing in his own proper person comes PERCY LEE MELTON, for answer to the allegations of plaintiff's petition and claim as follows, to-wit:

I.

Respondent, Percy Lee Melton, denies the allegations of Count One of plaintiff's petition.

II.

Respondent, Percy Lee Melton, denies the allegations of Count Two of plaintiff's petition.

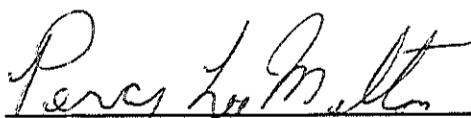
AND NOW FURTHER ANSWERING:

SEAL, LEE, FENDLASON
AND BRANCH
Attorneys At Law
319 Memphis Street
Bogalusa, Louisiana

III.

Respondent, Percy Lee Melton, shows that he filed a petition for voluntary bankruptcy in the United States District Court, Eastern District of Louisiana, on July 29, 1969, in the matter entitled "Percy Lee Melton Docket No. 69-1319" and listed plaintiff's claim on Schedule A-3, Item 6; respondent further shows that he was subsequently discharged and that this claim is now barred, and accordingly respondent urges the special defense of bankruptcy.

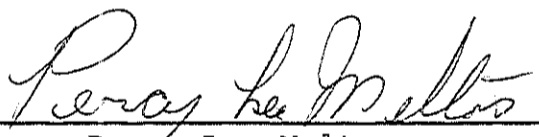
WHEREFORE, respondent prays that this answer be deemed sufficient and that after all due delays elapse and due proceedings had, there be judgment herein in favor of respondent, Percy Lee Melton, rejecting the demands of plaintiff at her cost.


Percy Lee Melton

C E R T I F I C A T E

I hereby certify that I have mailed a copy of the above and foregoing answer to Mr. Warren L. Finch, Attorney at Law, P. O. Box 4453, Mobile, Alabama, Attorney for Plaintiff, by placing a copy of same in the United States Mail, postage pre-paid.

Bogalusa, Louisiana, October 16, 1969.


Percy Lee Melton

FILED

OCT 23 1969

ALICE J. DUCK CLERK
REGISTER

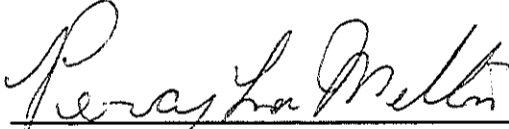
SEAL, LEE, FENDLASON
AND BRANCH
Attorneys At Law
319 Memphis Street
Bogalusa, Louisiana

STATE OF LOUISIANA


PARISH OF WASHINGTON

BEFORE ME, the undersigned authority, personally came and appeared PERCY LEE MELTON, who, after being duly sworn, did depose and state:

That he is the respondent in the above and foregoing answer; that he has read same and knows the contents thereof, and that all facts and allegations contained therein are true and correct.


Percy Lee Melton

Sworn to and subscribed before me
this the 16th day of October, 1969.


Donald H. Lee, NOTARY PUBLIC

My commission expires at my death.

SEAL, LEE, FENDLASON
AND BRANCH
Attorneys At Law
319 Memphis Street
Bogalusa, Louisiana

FILED
OCT 23 1969
ALICE T. [unclear]