

6471A
MISS MONYA BARTLETT, a minor
by and through her father and
next of kin, DANIEL W. BARTLETT

Plaintiff

VS.

ETHEL LEE BELLON

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

CASE NO.

7916

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, 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's minor daughter was a passenger, and as a proximate result of said negligence the plaintiff's minor daughter was caused injury suffering, bruised, contusions and abrasions about her body and a portion of her tongue was severed.

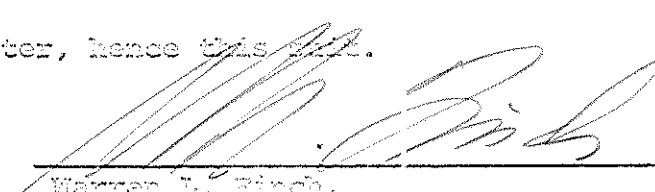
Plaintiff has been caused to expend monies for doctors and medical bills, and ambulance services and drugs for said minor daughter, and caused much pain and suffering and much anxiety for said minor daughter, hence this suit.

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, 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's minor daughter was a passenger, and as

a proximate result of said willfulness the plaintiff's minor daughter was caused injury suffering, bruises, contusions and abrasions about her body and a portion of her tongue was severed.

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


Warren L. Finch,
Attorney for the Plaintiff

FILED

DEC 14 1968

ALICE J. ECKA CLERK
REGISTER

MISS MONNA BARTLETT, a minor
by and through her father and
next of kin, DANIEL W. BARTLETT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Plaintiff

VS.

ERNEY LEE NELSON

Defendant

CASE NO. _____

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, 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's minor daughter was a passenger, and as a proximate result of said negligence the plaintiff's minor daughter was caused injury, suffering, bruised, contusions and abrasions about her body and a portion of her tongue was severed.

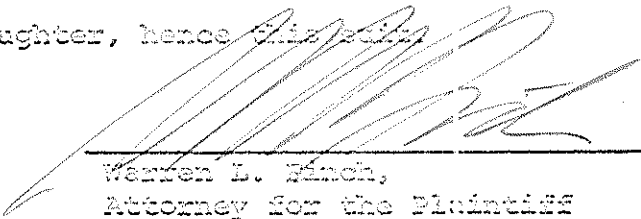
Plaintiff has been caused to expend monies for doctors and medical bills, and ambulance services and drugs for said minor daughter, and caused much pain and suffering and much anxiety for said minor daughter, hence this suit.

COUNT TWO

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a proximate result of said willfulness the plaintiff's minor daughter was caused injury suffering, bruises, contusions and abrasions about her body and a portion of her tongue was severed.

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



Warren L. Finch,
Attorney for the Plaintiff

FILED

DEC 14 1961

RECEIVED J. BERRY CLERK
ALICE G. BERRY REGISTER

MISS TONYA BARTLETT, a minor
by and through her father and
next of kin, DANIEL W. BARTLETT

Plaintiff

VS.

PERCY LEE MELTON

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

CASE NO. 7916

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, 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's minor daughter was a passenger, and as a proximate result of said negligence the plaintiff's minor daughter was caused injury suffering, bruised, contusions and abrasions about her body and a portion of her tongue was severed.

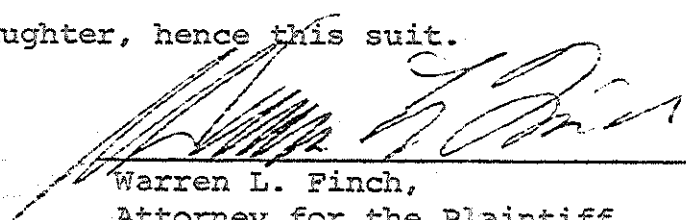
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COUNT TWO

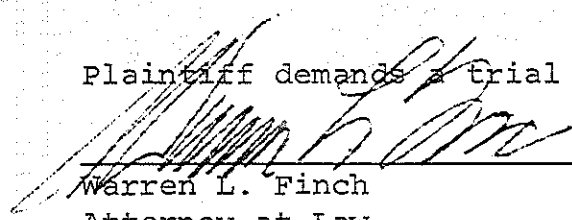
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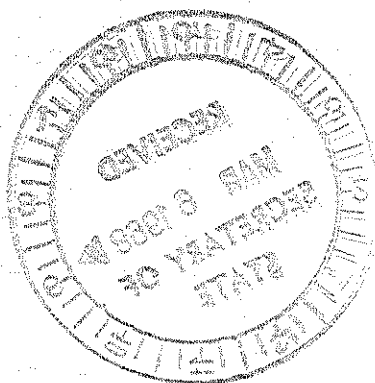
Plaintiff has been caused to expend monies for doctors and medical bills, and ambulance services and drugs for said minor daughter, and caused much pain and suffering and much anxiety for said minor daughter, hence this suit.


Warren L. Finch,
Attorney for the Plaintiff

Plaintiff demands a trial by jury.


Warren L. Finch
Attorney at Law

Defendant's address is:
Rt. 2, Box 222
Bogalusa, Louisiana



SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 7916

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Percy 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.....

by Miss Tonya Bartlett, a minor by and through her father and next of kin,

Daniel W. Bartlett, Plaintiff.....

Witness my hand this 14th day of December 1967

Alice Duck 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

March 14, 1968

MISS TONYA BARTLETT, A MINOR BY AND THROUGH
HER FATHER AND NEXT OF KIN, DANIEL W. BARTLETT,
Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

VS

PERCY LEE MELTON, Defendant

CASE NO. 7,916

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

I, Mabel Amos, Secretary of State, hereby certify that on March 6, 1968
I sent by certified mail in an envelope addressed as follows:

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

"Certified Mail—
Return Receipt Requested
Deliver to Addressee Only"

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of
the State of Alabama in words and figures as follows:

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

You will take notice that on March 6, 1968 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: MISS TONYA BARTLETT, A MINOR BY AND THROUGH HER FATHER AND
NEXT OF KIN, DANIEL W. BARTLETT, Plaintiff VS PERCY LEE MELTON, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
Case No. 7,916 a true copy of which summons and complaint is attached hereto
and the said service upon me as Secretary of State of the State of Alabama has the force and
effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 6th
day of March, 1968

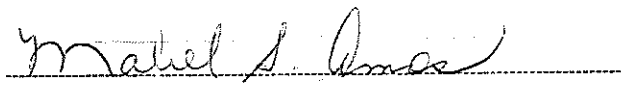
Enclosure (1)

(Signed) Mabel Amos
Secretary of State"

I further certify that the notice above set out which was so mailed in the envelope addressed
as above set forth had attached to it a true copy of the summons and complaint in the above-styled
cause.

I further certify that on March 13, 1968 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Bogalusa, La.
on March 11, 1968

WITNESS MY HAND and the Great Seal of the State of Alabama this the 14th day
of March, 1968


Mabel Amos
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

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

MISS TONYA BARTLETT, a minor
by and through her father and
next of kin, DANIEL W. BARTLETT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Plaintiff

VS.

PERCY LEE MELTON

Defendant

CASE NO. 7916

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, 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's minor daughter was a passenger, and as a proximate result of said negligence the plaintiff's minor daughter was caused injury suffering, bruised, contusions and abrasions about her body and a portion of her tongue was severed.

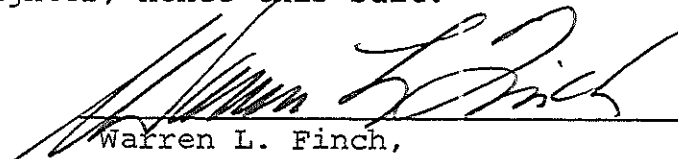
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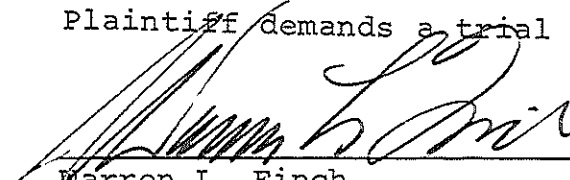
a proximate result of said willfulness the plaintiff's minor daughter was caused injury suffering, bruises, contusions and abrasions about her body and a portion of her tongue was severed.

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Warren L. Finch,
Attorney for the Plaintiff

Plaintiff demands a trial by jury.



Warren L. Finch
Attorney for the Plaintiff

Defendant's address is:
Rt. 2 Box 222
Bogalusa, Louisiana

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 7916

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You Are Hereby Commanded to Summon Percy Lee Melton

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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.....

by Miss Tonya Bartlett, a minor by and through her father and next of kin.....

..... Daniel W. Bartlett Plaintiff.....

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

..... Alice J. [Signature] Clerk

No. 7916

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MISS TONYA BARTLETT, a minor by
and through her father and next
of Kin, Daniel W. Bartlett

Plaintiffs

vs.

BERNARD LEE MELTON

Defendants

SUMMONS AND COMPLAINT

Filed Dec. 14, 1967

Alice J. Duck Clerk

Warren L. Finch

Plaintiff's Attorney

Defendant's Attorney

1803
RECEIVED IN OFFICE
Defendant lives at

(3)
MAR 5 1968

M. Received in Office

MAR 7 1968

ADL W. WILKINS

Sheriff

I have executed this summons

this 19

by leaving a copy with

Executed by serving 2 copies of
the within on Noble E. ...
Secretary of State of The State of
Alabama.

This was 4 day of March 19 68

Sheriff of Montgomery County

M. S. Butler,

By W. L. Mason D. S.

M. S. Butler, Sheriff of Montgomery
County, Alabama, Claim \$1.50 each for
serving 1 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