

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY, ALABAMA 36104 April 30, 1968

Honorable James R. Owen 110 Court House Square Bay Minette, Alabama 36507

Dear Mr. Owen:

8096

Re: HAROLD SHIRLEY, Plaintiff VS HARRY MCGEE, et al. Defendants

Please refer to your file in the above-styled cause and be advised that on April 19, 1968 , I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Harold McGee 2525 Fairfield Drive Pensacola, Florida 32505

On April 29, 1968 , this letter (Certified No. 54824) was returned to me with reason for non-delivery given as "MOVED, LEET NO ADDRESS".

Will you please advise me as to any further efforts you wish me to make in perfecting this service.

Yours very truly,

Mabel Amos Secretary of State

fc
cc: Honorable Alice J. Duck, Clerk
Gircuit Gourt of Baldwin County
Bay Minette, Alabama 36507

April 23, 1968

HAROLD SHIRLEY, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

VS

CAROLYN FEW MCCRANEY, et al, Defendants

CASE NO. 8,096

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

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

April 19, 1968

"Carolyn Few McCraney 617 West Mass Avenue Pensacola, Florida 32505"

"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:

"Carolyn Few McCraney 617 West Mass Avenue Pensacola, Florida 32505

You will take notice that on April 19, 1968 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: HAROLD SHIRLEY, Plaintiff VS CAROLYN FEW MCCRANEY, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

Case No. 8,096 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 day of April, 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 April 22, 1968 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Pensacola, Fla. on April 20, 1968

WITNESS MY HAND and the Great Seal of the State of Alabama this the

23rd

day

of April, 1968

Mabel Amos Secretary of State

Enclosures: Return Receipt Card and copy

of Summons and Complaint.

CC: Honorable James R. Owen 110 Court House Square Bay Minette, Alabama 36507 STATE OF ALABAMA)

**
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Carolyn Few McCraney and Harrey McGee 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 the same, then and there to answer the complaint of Harold Shirley.

WITNESS my hand this day of April, 1968.

Clice J. Ouch

The address of the defendants follows: Carolyn Few McCraney, 617 West Mass Avenue, Pensacola, Florida; Harrey McGee, 2525 Fairfield Drive, Pensacola, Florida.

HAROLD SHIRLEY,

Plaintiff,

VS.

CAROLYN FEW McCRANEY and HARREY McGEE,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW 8096

COMPLAINT

COUNT ONE

Plaintiff claims of the defendants Two Hundred Fifty Dollars (\$250.00) for that heretofore on to-wit, February 11, 1968, at Cliff's Boat Landing, which is 9 miles West of Bay Minette, Baldwin County, Alabama, at a point 300 feet West of Baldwin County Highway No. 7, which point is also in Baldwin County, Alabama, the defendant, Carolyn Few McCraney, who was then and there an agent, servant or employee of the defendant, Harrey McGee, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated an automobile so as to cause it to run into, upon or against one boat and gas tank, the property of the plaintiff,

completely demolishing the said property, all of which damage was caused as a proximate result of the negligence of the defendant, Carolyn Few McCraney, at said time and place, while acting as an agent, servant or employee of the defendant, Harrey McGee, within the line and scope of her authority as such agent, servant or employee, hence this suit.

Attorney for Plaintiff

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Harold Shirley,

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Carolyn Jew Milliamen & Harrey Milee, Depts.

APR 1 8 1968

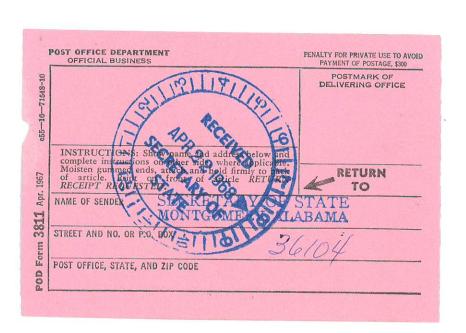
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County, Alabama, Claim \$1.50 each for serving process(es) and \$1.00 bravel expense on each of process(es) or a total of

Dames R. Uwen.

10. 2 16 or Deputy Sherite

| HAROLD SHIRLEY VS CAROLYN FEW MCCRANEY (8,096) |
|---|
| INSTRUCTIONS TO DELIVERING EMPLOYEE Show to whom, date, and address where delivered to addressee (Additional charges required for these services) |
| RECEIPT |
| Received the numbered article described below. |
| REGISTERED NO. SIGNATURE OR NAME OF ADDRESSEE (Must always be filled in) |
| CERTIFIED 40.5 Craner Signature of Addressee's AGENTLY ANY |
| INSURED NO. 8081 |
| DATE DELIVERED SHOW WHERE DELIVERED (only if requested) |
| c551671548-10 GPO |



STATE OF ALABAMAD the result of the negligence of the defendant, *

BALDWIN COUNTY rangey, at said time and place, while acting as an TO-ANY SHERIFF OF THE STATE OF ALABAMA: As the hereby commanded to summon Carolyn Few McCraney and Harrey McGee 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 the same, then and there to answer the complaint of Harold Shirley.

WITNESS my hand this 18 day of April, 1968.

Aliee Therek

The address of the defendants follows: APR 181988 Carolyn Few McCraney, 617 West Mass Avenue, Pensacola, Florida; Harrey McGee, 2525 Fairfield Drive, Pensacola, Florida.

HAROLD SHIRLEY,

Plaintiff,

VS.

CAROLYN FEW McCRANEY and HARREY McGEE,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

8096

COMPLAINT

COUNT ONE

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completely demolishing the said property, all of which damage was caused as a proximate result of the negligence of the defendant, Carolyn Few McCraney, at said time and place, while acting as an agent, servant or employee of the defendant, Harrey McGee, within the line and scope of her authority as such agent, servant or employee, hence this suit.

Actorney for Plaintiff

APR 1 8 1968

ALL J. CLERK REGISTER



J10: 3096

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