

WILLIAM V. WILLIAMS,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
MARY HOLLAND WHITE AND)	
CLAUDIS WHITE, Jointly)	
and Severally,)	
Defendants.)	CASE NO. <u>8162</u> <u>XXX/8</u>

COUNT ONE

Plaintiff claims of the defendants, jointly and severally, the sum of, TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) DOLLARS as damages for that heretofore and on, to-wit, July 17, 1967, defendant Mary Holland White, while acting as an agent, servant or employee of defendant Claudis White, and who was then and there acting within the line and scope of her authority as such, so negligently operated an automobile on Foley Cut-Off Road, a public road in the County of Baldwin, State of Alabama at or near the intersection of said road with Baldwin County Road No. 32, a public road in said County and said State, that the said automobile then and there collided with the plaintiff who was then and there riding as a passenger in an automobile on said Baldwin County Road No. 32, and as a proximate result of the negligence of the defendants as aforesaid, plaintiff was made sick, sore and lame, his face was lacerated and bruised, he was hospitalized, he incurred medical expenses for the treatment of his injuries and lost time from his employment, for all of which the plaintiff brings this suit.

COUNT TWO

Plaintiff claims of the defendants, jointly and severally, the sum of, TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) DOLLARS as damages for that on, to-wit, July 17, 1967, defendant Mary Holland White, while acting as an agent, servant or employee of defendant Claudis White, and who was then and there acting within the line and scope of her authority as such, wantonly damaged the plaintiff by wantonly driving an automobile into and against the automobile in which plaintiff was riding as a passenger, plaintiff avers that at the time and place complained the vehicle operated by defendant Mary Holland White was being operated on Foley Cut-Off Road, a public road in the County of Baldwin, State of Alabama at or near the intersection of said road with Baldwin County Road No. 32, a public road in said County and said State and that the vehicle in which plaintiff was riding as a passenger was being operated on said Baldwin County Road No. 32. Plaintiff avers that as a proximate result of the wanton conduct of the defendants as aforesaid, plaintiff was made sick, sore and lame, his face was lacerated and bruised, he was hospitalized, he incurred medical expenses for the treatment of his injuries and lost time from his employment, for all of which the plaintiff brings this suit.

LYONS, PIPES AND COOK
Attorneys for Plaintiff.

By: Augustine Meaher III
Augustine Meaher, III

Defendants may be served
as follows:

Route 1, Box 210 Summerdale, Alabama

FILED

JUN 4 1968

VOL 58 PAGE 827

ALICE J. BELL CLERK
RECTOR

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. ~~8886~~ 8162

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

MARY HOLLAND WHITE AND CLAUDIS WHITE, Jointly and Severally

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.....

MARY HOLLAND WHITE AND CLAUDIS WHITE, Jointly and Severally, Defendant.....

by

WILLIAM V. WILLIAMS, Plaintiff.....

Witness my hand this..... 4..... day of..... June..... 19.68.

Reece J. Jones, Clerk

No. ~~8167~~ 8167-

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WILLIAM V. WILLIAMS

Plaintiffs

vs.

MARY HOLLAND WHITE & CLAUDIS WHITE,
jointly and severally

Defendants

SUMMONS AND COMPLAINT

Filed June 4, 19.. 68..

Alice J. Duck Clerk

Lyons, Pipes, and Cook

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received in Office

JUN 5 1968

..... Sheriff
I have executed this summons

this 19.....
by leaving a copy with

Mary Holland White
Claudis White

10 day of diligent search and in-
turned
Not found in my county
Sheriff
Deputy Sheriff

..... Sheriff

..... Deputy Sheriff

WILLIAM V. WILLIAMS,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
MARY HOLLAND WHITE AND)
CLAUDIS WHITE, Jointly)
and Severally,)
Defendants.) CASE NO: 8162

STATE OF ALABAMA

COUNTY OF MOBILE

COMES NOW Augustine Meaher, III, attorney of record for the plaintiff in this cause, being duly sworn on oath, deposes and says:

That in the belief of such affiant defendants Mary Holland White, the operator of one of the vehicles referred to in the complaint, and Claudis White, owner of one of the vehicles referred to in the complaint, did leave and remain away from the State of Alabama for a period of sixty (60) days after the date of the accident made the basis of this suit and that such defendants did absent themselves from the State of Alabama for such a period that the Sheriff of Baldwin County could not serve process upon them in this cause;

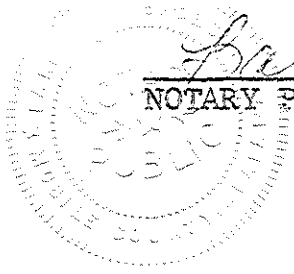
That to the best of affiant's knowledge, information and belief, the Post Office address of said defendants are as follows:

Mary Holland White	Claudis White
c/o Monsanto Chemical Corporation	c/o Pace Holland Company
Cantonment, Florida	Chaney Street
	Brent Area of Pensacola, Florida

The plaintiff requests that process shall be issued as provided for by Title 7 Section 199 (1), Code of Alabama, recompiled, 1958 as amended.

Augustine Meaher
Augustine Meaher, III

Subscribed and sworn to before me on this 11th day of
November, 1968.



Barbara Nickerson
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8162

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

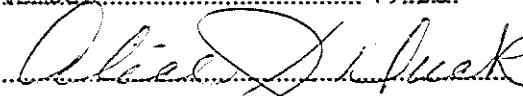
You Are Hereby Commanded to Summon Mary Holland White and Claudis White, Jointly
and Severally

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.....

Mary Holland White and Claudis White, Jointly & Severally..... Defendant.....

by William V. Williams
..... Plaintiff.....

Witness my hand this.....13th.....day of.....November.....19.68.

 Clerk

ORIGINAL

No. 8162

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WILLIAM V. WILLIAMS

Plaintiffs

vs.

MARY HOLLAND WHITE & CLAUDIS
WHITE, Jointly & Defendants
Severally

SUMMONS AND COMPLAINT

Filed 19.....

M. S. Butler, Sheriff of Baldwin
County, Alabama, Claim \$1.50 each for
serving 2 process(es) and \$1.00
travel expense on each of 2
process(es) or a total of \$5.00

W. L. Mason Deputy Sheriff

Lyons, Pipes & Cook
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

685

RECEIVED
RECEIVED IN OFFICE
NOV 18 1968
Received In Office
NOV 20 1968
M. S. BUTLER, Sheriff

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Executed by me, the undersigned, on this 20th day of Nov. 1968, at Baldwin County, Alabama, in and to the effect of the State of Alabama. This is the 20th day of Nov. 1968. M. S. Butler, Sheriff of Baldwin County. By W. L. Mason D. S.

Sheriff

Deputy Sheriff

WILLIAM V. WILLIAMS,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
vs.)	AT LAW
)	
MARY HOLLAND WHITE AND CLAUDIS)	
WHITE, separately and severally,)	CASE NO. 8162
)	
Defendants.)	

DEMURRER

Come now the defendants, Mary Holland White and Claudis White, separately and severally, and demur to the plaintiff's complaint herein filed and each count thereof, separately and severally, and for grounds of demurrer set down and assign, separately and severally, the following:

I.

That it does not state facts sufficient to constitute a cause of action against these defendants.

II.

For that negligence is therein alleged merely as a conclusion of the pleader.

III.

For that it is vague, indefinite, and uncertain in that it does not apprise the defendants with sufficient certainty against what act or acts of negligence defendants are called on to defend.

IV.

From aught that appears this defendant breached no duty which he owed to the plaintiff at the time and place complained of in the complaint.

V.

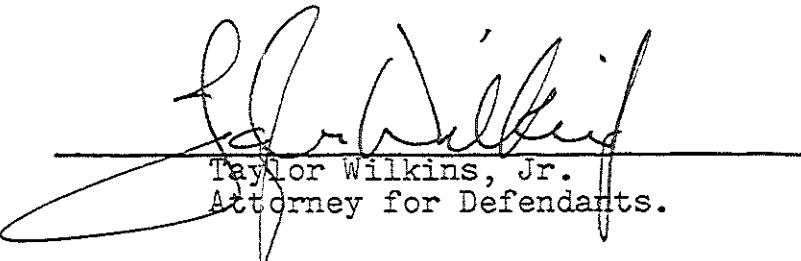
For that the averments set up, if true, do not show liability on the part of these defendants.

VI.

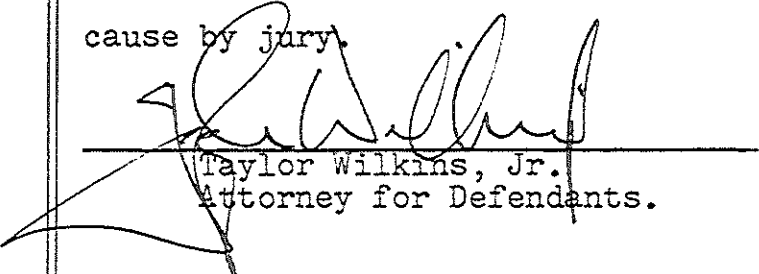
No facts are alleged to show that plaintiff sustained any damage or injury as a proximate result of any negligence or breach of duty on the part of these defendants.

VII.

It does not appear from the complaint that defendants are jointly liable.


Taylor Wilkins, Jr.
Attorney for Defendants.

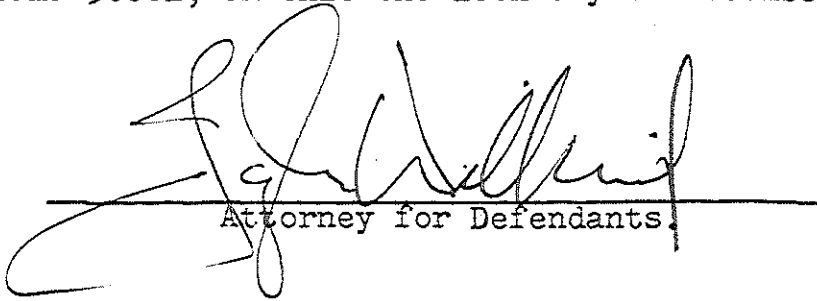
Defendants demand trial of this cause by jury.


Taylor Wilkins, Jr.
Attorney for Defendants.

STATE OF ALABAMA

BALDWIN COUNTY

I hereby certify that a copy of the foregoing Demurrer has been served upon Honorable Augustine Meador, III, Attorney for Plaintiff, by depositing a copy of same in the United States mail, with proper postage affixed thereto, and addressed to him at Lyons, Pipes and Cook, Attorneys at Law, 2510 First National Bank Building, Mobile, Alabama 36601, on this the 18th day of December, 1968.


Attorney for Defendants.

FILED

DEC 18 1968

ALICE J. BECK CLERK
REGISTER

8162

June

Williams
vs
Whites

FILED

DEC 18 1968

ALICE J. DUCK

CLERK
REGISTER

November 26, 1968

WILLIAM V. WILLIAMS, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS.

CLAUDIS WHITE, et al, Defendants

CASE NO. 8162

STATE OF ALABAMA
MONTGOMERY COUNTY

Before me, Sara F. Blackerby, a Notary Public in and for said State-at-Large, personally appeared Mabel Amos, Secretary of State of the State of Alabama, who is known to me and who, being duly sworn, deposes and says that in her official capacity as Secretary of State of the State of Alabama she, on the 20th day of November, 1968 sent by certified mail in an envelope addressed as follows:

" Claudis White
c/o Pace Holland Company
Chaney Street
Brent Area of Pensacola, Florida 32502"

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

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

" Claudis White
c/o Pace Holland Company
Chaney Street
Brent Area of Pensacola, Florida 32502

You will take notice that on November 20, 1968 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, Summons and Complaint and Affidavit in a case entitled: WILLIAM V. WILLIAMS, Plaintiff VS CLAUDIS WHITE, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 8162

a true copy of which Summons and Complaint and Affidavit are 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, said service being under provisions of Title 7, Section 199(1) of the 1940 Code of Alabama and Supplement thereto.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 20th day of November, 1968

(Signed) Mabel S Amos
Mabel S Amos
Secretary of State"

Enclosures (2)

Affiant further says 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 and Affidavit in the above-styled cause.

Affiant further says that on November 25, 1968 she received the "Return Card" showing receipt by the designated addressee of the aforementioned matter at Pensacola, Fl. on November 23, 1968

Mabel S. Amos
Affiant—Mabel Amos
Secretary of State

Sworn to and subscribed before me, this the 26th day of November, 1968

Sara F. Blackerby
Notary Public—State-at-Large
My Commission expires: 1-17-71

Enclosures—"Return Receipt" and
Copy of Process

CC: Honorable Augustine Meaher, III
Lyons, Pipes and Cook
2510 First National Bank Building
Mobile, Alabama 36601

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. ~~8162~~.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

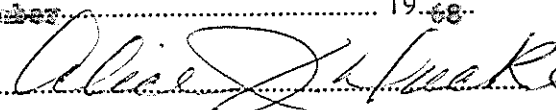
You Are Hereby Commanded to Summon ~~MARY HOLLAND WHITE & CLAUDIS WHITE, Jointly~~
~~& Severally~~

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.....

~~Mary Holland White & Claudis White, Jointly & Severally~~ Defendant.....

by ~~William V. Williams~~ Plaintiff.....

Witness my hand this ~~13th~~ day of ~~November~~ 19 ~~68~~.

 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

RECEIVED

Defendant lives at

NOV 18 1960

WILKINS

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

WILLIAM V. WILLIAMS,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
MARY HOLLAND WHITE AND)
CLAUDIS WHITE, Jointly)
and Severally,)
Defendants.) CASE NO: 8162

STATE OF ALABAMA

COUNTY OF MOBILE

COMES NOW Augustine Meaher, III, attorney of record for the plaintiff in this cause, being duly sworn on oath, deposes and says:

That in the belief of such affiant defendants Mary Holland White, the operator of one of the vehicles referred to in the complaint, and Claudis White, owner of one of the vehicles referred to in the complaint, did leave and remain away from the State of Alabama for a period of sixty (60) days after the date of the accident made the basis of this suit and that such defendants did absent themselves from the State of Alabama for such a period that the Sheriff of Baldwin County could not serve process upon them in this cause;

That to the best of affiant's knowledge, information and belief, the Post Office address of said defendants are as follows:

Mary Holland White
c/o Monsanto Chemical Corporation
Cantonment, Florida

Claudis White
c/o Pace Holland Company
Chaney Street
Brent Area of Pensacola, Florida

The plaintiff requests that process shall be issued as provided for by Title 7 Section 199 (1), Code of Alabama, recompiled, 1958 as amended.

Augustine Meaher III
Augustine Meaher, III

Subscribed and sworn to before me on this 13 day of
November, 1968.

Linda A. Kelley
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

FILED

NOV 13 1968

ALICE J. DUCK CLERK
REGISTER

WILLIAM V. WILLIAMS,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
MARY HOLLAND WHITE AND)	
CLAUDIS WHITE, Jointly)	
and Severally,)	
Defendants.)	CASE NO. <u>8162</u>

COUNT ONE

Plaintiff claims of the defendants, jointly and severally, the sum of, TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) DOLLARS as damages for that heretofore and on, to-wit, July 17, 1967, defendant Mary Holland White, while acting as an agent, servant or employee of defendant Claudis White, and who was then and there acting within the line and scope of her authority as such, so negligently operated an automobile on Foley Cut-Off Road, a public road in the County of Baldwin, State of Alabama at or near the intersection of said road with Baldwin County Road No. 32, a public road in said County and said State, that the said automobile then and there collided with the plaintiff who was then and there riding as a passenger in an automobile on said Baldwin County Road No. 32, and as a proximate result of the negligence of the defendants as aforesaid, plaintiff was made sick, sore and lame, his face was lacerated and bruised, he was hospitalized, he incurred medical expenses for the treatment of his injuries and lost time from his employment, for all of which the plaintiff brings this suit.

COUNT TWO

Plaintiff claims of the defendants, jointly and severally, the sum of, TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) DOLLARS as damages for that on, to-wit, July 17, 1967, defendant Mary Holland White, while acting as an agent, servant or employee of defendant Claudis White, and who was then and there acting within the line and scope of her authority as such, wantonly damaged the plaintiff by wantonly driving an automobile into and against the automobile in which plaintiff was riding as a passenger, plaintiff avers that at the time and place complained the vehicle operated by defendant Mary Holland White was being operated on Foley Cut-Off Road, a public road in the County of Baldwin, State of Alabama at or near the intersection of said road with Baldwin County Road No. 32, a public road in said County and said State and that the vehicle in which plaintiff was riding as a passenger was being operated on said Baldwin County Road No. 32. Plaintiff avers that as a proximate result of the wanton conduct of the defendants as aforesaid, plaintiff was made sick, sore and lame, his face was lacerated and bruised, he was hospitalized, he incurred medical expenses for the treatment of his injuries and lost time from his employment, for all of which the plaintiff brings this suit.

LYONS, PIPES AND COOK
Attorneys for Plaintiff.

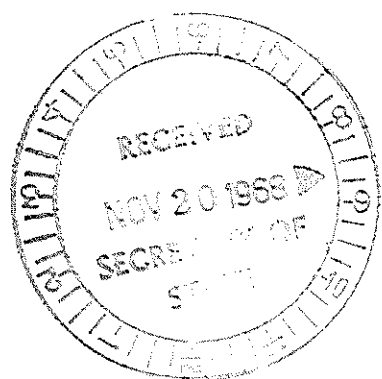
By: Augustine Meaher III
Augustine Meaher, III

Defendants may be served
as follows:

Route 1, Box 210 Summerdale, Alabama

Filed June 4, 1968
Alice J. Duck, Clerk

81611





MABEL AMOS
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY, ALABAMA 36104
January 13, 1969

Honorable Augustine Meaher, III
Lyons, Pipes & Cook
P. O. Drawer 2525
Mobile, Alabama 36601

Dear Mr. Meaher:

Re: WILLIAM V. WILLIAMS, Plaintiff VS
MARY HOLLAND WHITE, et al, Defendants

Please refer to your file in the above-styled cause and be advised that on December 2, 1968, I sent by certified mail return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Mary Holland White
7761 Castle Gate Drive
Pensacola, Florida 32504

On December 26, 1968, this letter (Certified No. 51264) 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 109(1), 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
November 27, 1968

Honorable Augustine Meaher, III
Lyons, Pipes and Cook
2510 First National Bank Building
Mobile, Alabama 36601

Dear Mr. Meaher:

8142

WILLIAM V. WILLIAMS, Plaintiff VS
Re: MARY HOLLAND WHITE, et al, Defendants

Please refer to your file in the above-styled cause and be advised that on November 20, 1968, I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Mary Holland White
c/o Monsanto Chemical Corporation
Cantonment, Florida 32533

On November 25, 1968, this letter (Certified No. 50823) was returned to me with reason for non-delivery given as "MOVED-LEFT NO ADDRESS".

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

Yours very truly,

fc

Mabel S. Amos
Secretary of State

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

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. ~~816~~ 816'2

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

.....MARY HOLLAND WHITE AND CLAUDIS WHITE, Jointly and Severally.....

.....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.....

.....MARY HOLLAND WHITE AND CLAUDIS WHITE, Jointly and Severally....., Defendant.....

by

.....WILLIAM V. WILLIAMS....., Plaintiff.....

Witness my hand this.....4.....day of.....June.....19.68.

.....Clerk

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. ~~8162~~ 8162

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

~~MARY HOLLAND WHITE AND CLAUDIS WHITE, jointly and severally~~

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.....

~~MARY HOLLAND WHITE AND CLAUDIS WHITE, jointly and severally~~..... Defendant.....

by

~~WILLIAM V. WILLIAMS~~....., Plaintiff.....

Witness my hand this..... day of..... 19.68..

Alfred Jones Clerk

LYONS, PIPES & COOK
ATTORNEYS AT LAW
2510 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)
SAM W. PIPES
WALTER M. COOK
GORDON B. KAHN
IRWIN W. COLEMAN, JR.
G. SAGE LYONS
AUGUSTINE MEAHER, III
JAMES B. KIERCE, JR.
WESLEY PIPES

36601

AREA CODE 205
TEL. 432-4483
P.O. DRAWER 2525

November 11, 1968

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

Re: Williams vs. White, et al
Case No: 8162

Saucier vs. White, et al
Case No: 8217

Kennedy vs. White, et al
Case No: 8218

Dear Mrs. Duck:

We understand that the Complaint and Summons in the above cases have been returned NOT FOUND. We understand that the defendants are now in Pensacola, Florida and thus we enclose the appropriate affidavits for service through the Secretary of State. We enclose our check in the amount of \$15.00 for service in these three cases. Please note that we are herewith enclosing an amended complaint and Interrogatories to each defendant in Case No: 8218 and request that the amended complaint and Interrogatories be served with the original Complaint and Summons. Finally, we enclose a xerox copy of our complaints in the above cases as required by the Secretary of State.

Yours very truly,

LYONS, PIPES AND COOK



Augustine Meaher, III
AM/bn

Enclosures

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)

36601

AREA CODE 205
TEL. 432-4483
P.O. DRAWER 2525

SAM W. PIPES

WALTER M. COOK

GORDON B. KAHN

IRWIN W. COLEMAN, JR.

G. SAGE LYONS

AUGUSTINE MEAHER, III

JAMES B. KIERCE, JR.

WESLEY PIPES

May 31, 1968

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED.

no. ~~47756~~
8169

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

Re: William V. Williams, Plaintiff vs. Mary Holland White
and Claudis White, Jointly and Severally, Defendants.

Dear Mrs. Duck:

We enclose our complaint in the above matter and ask that
it be filed in your Court. Please advise us when service
has been obtained on the defendants.

Very truly yours,

LYONS, PIPES AND COOK

Augustine Meaher III

Augustine Meaher, III

AM/bn

Enclosure

WILLIAM V. WILLIAMS,

Plaintiff,

VS.

MARY HOLLAND WHITE AND CLAUDIS
WHITE, separately and severally,

Defendants.

*
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*
*
*
*
*
*
*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

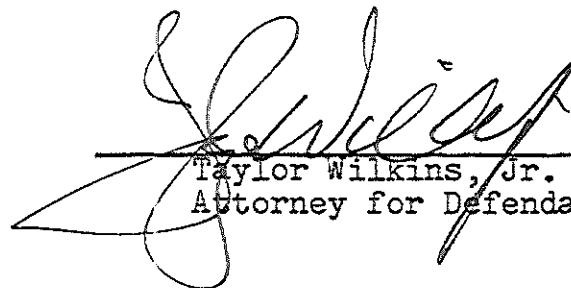
CASE NO. 8162

PLEA

Come now the defendants, Mary Holland White and Claudis White, separately and severally, and without waiving the demurrer heretofore filed to the plaintiff's complaint, file this plea to the plaintiff's complaint and each count thereof separately and severally:

I.

The defendants deny each and every allegation of the Plaintiff's complaint and each count thereof and demand strict proof of the same.


Taylor Wilkins, Jr.
Attorney for Defendants.

STATE OF ALABAMA

BALDWIN COUNTY

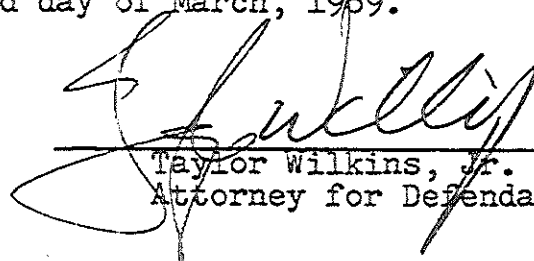
I hereby certify that a copy of the foregoing Plea has been served upon Honorable Augustine Meaher, III, Attorney for Plaintiff, by depositing a copy of same in the United States mail, with proper postage affixed thereto, and addressed to him at Lyon, Pipes and Cook, Attorneys at Law, 2510 First National Bank Building, Mobile, Alabama 36601, on this the 3rd day of March, 1969.

FILED

MAR 4 1969

ALICE J. DUCK

CLERK
REGISTER


Taylor Wilkins, Jr.
Attorney for Defendants.

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE, \$300

POSTMARK OF
DELIVERING OFFICE

CS5-16-71548-10

POD Form 3811 Apr. 1967

INSTRUCTIONS: Show name and address below and complete instructions on other side, where applicable. Moisten gummed ends, attach and hold firmly to back of article. Print on front of article **RETURN RECEIPT REQUESTED**.

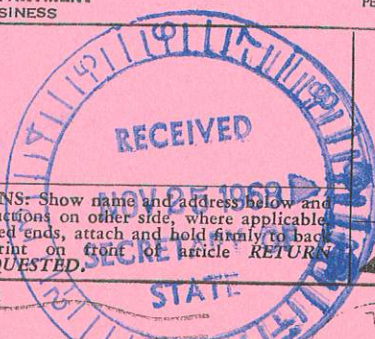
**RETURN
TO**

NAME OF SENDER

STREET AND NO. OR P.O. BOX

POST OFFICE, STATE, AND ZIP CODE

SECRETARY OF STATE
MONTGOMERY, ALABAMA



7J
26104

WILLIAM V. WILLIAMS VS CLAUDIS WHITE (8162)

INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Show to whom, date, and address where delivered ☒ Deliver ONLY to addressee
(Additional charges required for these services)

RECEIPT

Received the numbered article described below.

REGISTERED NO.	<div>1</div> <div>2</div> <div>3</div>	SIGNATURE OR NAME OF ADDRESSEE (<i>Must always be filled in</i>)
CERTIFIED NO. 551		<i>Claudia E White</i>
INSURED NO.		SIGNATURE OF ADDRESSEE'S AGENT, IF ANY
DATE DELIVERED 11/23/68		SHOW WHERE DELIVERED (<i>only if requested</i>)

c55-16-71548-10 GPO