

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

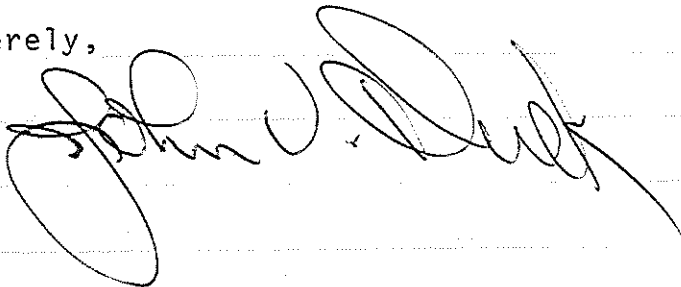
DATE June 17, 1968

Re: Romac Company vs. Michael W. Brackins
and Paul Lightley

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed together with copy of same and
Summons to be served.

Sincerely,



SIGNED

SIGNED

JOHN V. DUCK
ATTORNEY AT LAW
P. O. BOX Y
FAIRHOPE, ALABAMA 36532

June 16, 1969

Mrs. Alice J. Duck
P. O. Box 239
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Romac Company, et al
Vs: Michael W. Brackins, et al

Enclosed you will find an amended Bill of Complaint changing the name of one of the defendants from "Paul Lightley" to "Paul Lightsey".

This was a typographical error, and I am sure it is the reason why Paul Lightsey was not served at the last known address given to you.

Would you please reissue this suit and forward the same to the Sheriff, along with a copy of my letter stating that Paul Lightsey is residing at the Mobile address that I gave you, and that Michael W. Brackins is still residing in Foley. Both of these have been verified.

Sincerely,



JOHN V. DUCK

JVD/ts

encl.

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8126

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonMICHAEL W. BRACKINS and PAUL LIGHTLEY

.....
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.....

MICHAEL W. BRACKINS and PAUL LIGHTLEY Defendant.....

byROMAC COMPANY, a Co-Partnership consisting of ROBERT VAN IDERSTINE
and LAWRENCE B. McINTOSH Plaintiff.....

Witness my hand this.....19.....day of.....June.....1968
.....Clise J. Luck..... Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ROMAC COMPANY, a Co-Partnership

consisting of ROBERT VAN IDERSTINE
and LAWRENCE B. MCINTOSH

Plaintiffs

vs.

MICHAEL W. BRACKINS and PAUL
LIGHTLEY

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Michael W. Brackins - Foley, Ala
Paul Lightley, Rt. 1, Box 137
Foley, Ala

Received In Office

..... 19.....

..... Sheriff

I have executed this summons

this 19.....

by leaving a copy with

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

....., Sheriff

..... Deputy Sheriff

June 16, 1969

W. J. Duck
Box 239
Mette, Alabama

W. J. Duck:

Re: Romac Company, et al
Vs: Michael W. Brackins, et al

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residing in Foley. Both of these have been
ed.

ely,


DUCK

*to: mobile Return "Not found as
Paul Lightsey & not Paul Lightley.*

*Michael W. Brackins lives in
Florida & not Foley. Thus
the line in Foley*

Bay Minette, Ala.,

June 3

19 69

To the Sheriff of

Mobile

County,

Mobile

Alabama

I enclose herewith

HC for Paul Lightsey - 713 Glenwood
Mobile, Ala.

Please serve and return as early as possible.

Jayla Wilkins

Sheriff, Baldwin County, Alabama

(If not found in your county, please advise promptly giving information as to present location if possible)

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ROMAC COMPANY, a Co-Partnership,
consisting of ROBERT VAN DERSTINE
and LAWRENCE B. McINTOSH,

Plaintiffs,

vs.

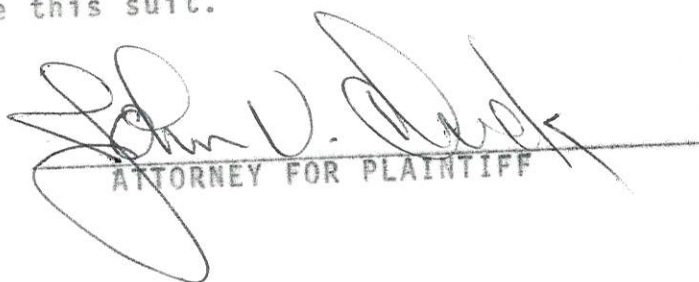
MICHAEL W. BRACKINS and PAUL
LIGHTLEY, jointly and individually,

Defendants.

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
) AT LAW

COUNT ONE

Plaintiff claims of the Defents the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages, for that heretofore on, to-wit: the 9th day of March, 1968 Plaintiff's motor vehicle was being operated along Greeno Road at a point thereon 400 feet from its intersection with Fairhope, Alabama, which was then and there a public highway in Baldwin County, Alabama, and at the said time and place, the Defendant, MICHAEL W. BRACKINS, as the agent, servant or employee of the Defendant, PAUL LIGHTLEY, and while acting within the line and scope of his authority, so negligently operated his said motor vehicle as to allow it to run into, upon or against the Plaintiff's said motor vehicle, and as a proximate consequence thereof, the Plaintiff's motor vehicle was damaged in that the running board was smashed; the right rear fender was smashed, bent and otherwise torn; one hubcap was damaged and had to be replaced; that the right front fender was bent, smashed and otherwise torn and had to be repaired; that the right side of the Plaintiff's motor vehicle was bent, smashed and otherwise torn and had to be repaired, all as a proximate consequence of the Defendant's negligence, hence this suit.


ATTORNEY FOR PLAINTIFF

FILED

JUN 19 1968

ALICE J. DUCK CLERK
REGISTER