

FORREST W. WHITE,

Plaintiff

VS.

GEORGE JOSEPH JONES

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8274

DEMURRERS

1.

From the pleading the Defendant is unable to determine the amount of damage claimed for injury to the automobile, and the amount claimed for personal injuries.

2.

There is a misjoinder of causes of action in this suit.

WILKERS, BRANTLEY & NESBIT

BY:

Sam M Brantley
Attorney for Defendant

The Defendant demands a trial by jury.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 28 day of Aug, 1968, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILKERS, BRANTLEY & NESBIT

By:

Sam M Brantley

FILED

AUG 28 1968

ALICE J. DUCK

CLERK
REGISTER

PLEAS

FORREST W. WHITE

Plaintiff

VS.

GEORGE JOSEPH JONES

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8274

1.

Not guilty.

2.

The matters alleged in this Complaint are not true.

WILTERS, BRANTLEY & NESBIT

BY:

William M Brantley
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 9 day of Sept
1969 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By:

WMB ranch

FILED

SEP 5 1969

VOL

62 PAGE 530

ALICE J. BUCK

CLERK
REGISTER

ALICE J. RISK
11-14-69

Refiled.

Jeffery, master
Judge

FILED

SEP 5 1969

We the jury find for the Plaintiff
and assess damages in the amount
of \$1600.00.

Mr. Batterson, Jr.
Foreman

FORREST W. WHITE,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
GEORGE JOSEPH JONES,	X	AT LAW
Defendant.	X	
	X	

AMENDED COMPLAINT

Comes now the Plaintiff in the above styled cause and amends his Complaint heretofore filed so that the same shall read as follows:

The Plaintiff claims of the Defendant the sum of Sixteen Hundred Dollars (\$1,600.00) as damages for that on, heretofore, to-wit: the 18th day of May, 1968, at 7:40 P. M. on U. S. Highway No. 98 in front of Mitchell's Laundry in Daphne, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against the vehicle of the Plaintiff and that as a proximate result of such negligence, the Plaintiff's automobile was totally destroyed, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: Edward E Ball

FILED

NOV 14 1969

ALICE J. DUEK CLERK
REGISTER

8274
Forrest White
vs. George Joseph Jones
JURY LIST - NOVEMBER 10, 1969 TERM
BALDWIN COUNTY

- ~~1. Campbell, A. C., Jr., Farmer, Rosinton~~
- ~~2. Heil, William, Farmer, Elberta~~
- ~~3. Overstreet, Layton J., Fairhope~~
- ~~4. Henry, Lorraine, T., Fairhope~~
- ~~5. Conrou, Al E., Brookley Field, Fairhope~~
- ~~6. Dickman, Joe, P. O. Employee, Bay Minette~~
- ~~7. Early, L. J., Timber & Lumber, Foley~~
- ~~8. Flowers, John B., Farmer, Bon Secour~~
- ~~9. Garner, Carey, Merchant, Fairhope~~
- ~~10. Griffith, Jack, Shipyard, Fairhope~~
- ~~11. Gwaltney, John L., Farmer, Robertsdale~~
- ~~12. Hauga, Ralph O., Clerk, Silverhill~~
- ~~13. Hemmersdorf, Margaret B., Fairhope~~
- ~~14. Johnson, Coyle, Laborer, Bay Minette~~
- ~~15. Jones, Dolphus, S., Farmer, Lottie~~
- ~~16. Keldorfer, William E., County Emp., Elberta~~
- ~~17. Landcaster, Jack, Farmer, Robertsdale~~
- ~~18. Long, Lee, Rabon~~
- ~~19. Maury, Louis P., Fairhope~~
- ~~20. McDade, Adelaide Dodd, Fairhope~~
- ~~21. McGill, Reuben E., Fairhope~~
- ~~22. McLeod, George, State Emp., Gulf Shores~~
- ~~23. McMillan, Raymond N., Farmer, Stockton~~
- ~~24. Neal, Harold, Ponder Co., Fairhope~~
- ~~25. Patterson, Miller, Jr., Fairhope~~
- ~~26. Patton, William L., Jr., Fairhope~~
- ~~27. Phillips, Hazel L., Blacksher~~
- ~~28. Phillips, Martha L., Blacksher~~
- ~~29. Richards, Thomas M., Fairhope~~
- ~~30. Sirmon, Arthur, Farmer, Biforest~~
- ~~31. Steele, Ira, Mail Clerk, Fairhope~~
- ~~32. Sweat, C. D., Real Estate, Robertsdale~~
- ~~33. Thomas, Tom, Bacon McMillan, Bay Minette~~
- ~~34. Anderson, Mildred, Bay Minette~~
- ~~35. Barnhill, Roger, Farmer, Loxley~~
- ~~36. Berglin, Lavine, Jr., Salesman, Fairhope~~
- ~~37. Berglin, Ouida, Fairhope~~

P XXXXX XXXXX XX
D XXXXX XXXXX XX

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon George Joseph Jones 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 same, then and there to answer the Complaint of Forrest W. White.

Witness my hand this 20 day of August, 1968.

Alice J. Duck
Clerk

FORREST W. WHITE,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

vs.

X

BALDWIN COUNTY, ALABAMA

X

GEORGE JOSEPH JONES,

X

AT LAW

Defendant.

X

8274

The Plaintiff claims of the Defendant the sum of Sixteen Hundred Twenty-five Dollars and Thirty Cents (\$1625.30) as damages for that on, heretofore, to-wit: the 18th day of May, 1968, at 7:40 P.M. on U. S. Highway No. 98 in front of Mitchell's Laundry in Daphne, Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against the vehicle of the Plaintiff and that as a proximate result of such negligence, the Plaintiff's automobile was totally destroyed and the Plaintiff's son received lacerations and bruises, all in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

FILED

AUG 20 1968

ALICE J. DUCK

CLERK
REGISTER

VOL

By: John Earle Chason

62 PAGE 320

Received 21 day of Aug 1968
and on 27 day of Aug 1968
I served a copy of the within S & C
on George Joseph Jones

By service on Albani
Daphne
TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Sherriff claims 54 miles at
Ten Cents per mile Total \$ 5.40
Wm. TAYLOR WILKINS, Sheriff
Roy Randall
DEPUTY SHERIFF

8274

FORREST W. WHITE,

Plaintiff,

vs.

GEORGE JOSEPH JONES,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

Defendant may be served
at Daphne, Alabama
New Royal Garden Club

AUG 20 1968

CLERK
CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P. O. DRAWER 190
AREA CODE 205 - PHONE 943-2201
FOLEY, ALABAMA 36535

April 9, 1969

Honorable Telfair Mashburn
Judge of Circuit Court
Bay Minette, Alabama 36507

Re: Farm Service Center
Vs: J. W. Minchew
Case No. 8275

Dear Judge Mashburn:

Kindly render a judgment in this case based
on an sworn to itemized statement of account on
which there is a principal balance due of \$164.75,
plus \$5.25 interest, for a total of \$170.00.

Cordially yours,



FOREST A. CHRISTIAN

FARM SERVICE CENTER,	X	
PLAINTIFF,	X	IN THE CIRCUIT COURT OF
VS:	X	BALDWIN COUNTY, ALABAMA
J. N. MINCHEW,	X	AT LAW
DEFENDANT.	X	CASE NO. 8275


AFFIDAVIT

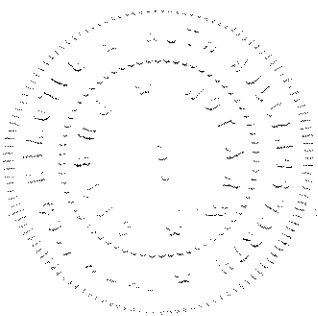
STATE OF ALABAMA,)
BALDWIN COUNTY.)

FOREST A. CHRISTIAN, first being duly sworn, deposes and says as follows: My name is FOREST A. CHRISTIAN and I am the attorney for the Plaintiff in the above styled case which was filed in the Circuit Court of Baldwin County, Alabama, on August 22, 1968, against J. N. MINCHEW and he was served on September 7, 1968. It has come to our attention that this debt is owed by his son, J. W. MINCHEW, who should be served at the address shown in the original complaint, a copy of said Summons and Complaint is attached for service on J. W. Minchew.


Forest A. Christian

Sworn to and subscribed before me
on this the 25th day of September, 1968.


Notary Public, Baldwin County, Alabama



SUMMONS

STATE OF ALABAMA,)

COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons J. N. MINCHEW, 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, Alabama, at the place of holding same by FARM SERVICE CENTER.

Witness my hand this the 22 day of August, 1968.

Alice J. Duck
Clerk

** ** *

COMPLAINT

FARM SERVICE CENTER,	X	
PLAINTIFF,	X	IN THE CIRCUIT COURT OF
VS:	X	BALDWIN COUNTY, ALABAMA
J. N. MINCHEW,	X	AT LAW
DEFENDANT.	X	720.8275

COUNT I:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTY-FOUR & 75/100 DOLLARS (\$164.75), due from him by account on, to wit: the 2nd day of April, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT II:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTY-FOUR & 75/100 DOLLARS (\$164.75), due from him on account stated between the Plaintiff and the Defendant on, to wit: the 2nd day of April, 1968, which sum of money, with interest thereon, is still unpaid.

COUNT III:

The Plaintiff claims of the Defendant ONE HUNDRED SIXTY-FOUR & 75/100 DOLLARS (\$164.75), due from him for merchandise, goods and chattels sold by the Plaintiff to the Defendant on, to wit: the 2nd day of April, 1968, which sum of money, with interest thereon, is still unpaid.

There is attached to the original hereof, an itemized statement of account, verified by the affidavit of a competent witness, sworn to before a notary public, which shows the amount due on this account as of the 21st day of August, 1968.

[Signature]
Attorney for the Plaintiff

Defendant's address is:

Mr. J. N. Minchew
c/o W. C. Davis
Magnolia Springs, Alabama

FILED

AUG 22 1968

ALICE J. DUCK CLERK
REGISTER

AFFIDAVIT

STATE OF ALABAMA)

COUNTY OF BALDWIN)

Before me, the undersigned authority in and for aforesaid County and State, who is a Notary Public under my seal of office, which seal of office is hereto attached, personally appeared

COLE D. BROWN known ~~and~~ being duly sworn upon his oath ~~sworn~~ that he is the President of

FARM SERVICE CENTER ^{Company} organized and doing business under the laws of the State of Alabama, that as

such he makes this affidavit, that he is familiar with the books and business of FARM SERVICE CENTER, that the attached account against J. N. MINCHEW

is just and correct, within the knowledge of the affidavit, that he has authority to make this affidavit and that he has personal knowledge of the entries contained herein, that the items thereon stated composing the said account, were sold and delivered to the above mentioned debtor at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said debtor is entitled as thereon stated, and that the balance thereof, amounting to the sum of \$164.75 with interest from April 2, 1968, is justly due and remains unpaid.

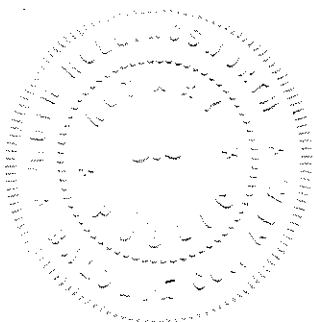
Cole D. Brown
Affiant Cole D. Brown, President of
Farm Service Center

Sworn to, subscribed, acknowledged, signed and sealed before me as a Notary Public under my seal of office, with my seal hereto affixed on this the 21st day of August, 1968.

Affix Seal:

Ruth Hollingsworth
Notary Public

My Commission Expires: Mar. 2, 1970



24: 9-7-68

MAGNOLIA SPRING
SUMMONS & COMPLAINT

Received 22 day of Aug 1968
and on 7 day of Sept 1968
served a copy of the within St. C.

By J. N. Minchew
y service on J. N. Minchew

TAYLOR WILKINS, Sheriff
By M. Eastburn D. S.
Mailbox Ala-

30
COUNTY CLERK
Eastburn

Received 26 day of Sept 1968
and on 7 day of Sept 1968
served a copy of the within St. C.
on J. N. Minchew

By service on [Signature]
TAYLOR WILKINS, Sheriff
By [Signature] D. S.
Bay Minette

FARM SERVICE CENTER,
PLAINTIFF,

VS:
J. N. MINCHEW,
965-2133
DEFENDANT.

FILED

AUG 23 1968

ALICE J. DUBOIS CLERK
REGISTER

LAW OFFICE OF
FOREST A. CHRISTIAN
(205) 943-2201
P. O. DRAWER 190
FOLEY, ALABAMA 36535

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA 36535