

ARMBRECHT, JACKSON & DE MOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

WM. H. ARMBRECHT
THEODORE K. JACKSON
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOK G. HOLMES
W. BOYD REEVES
JOHN GROW
FRANK B. MCRIGHT
Y. D. LOTT, JR.
CLIFFORD FOSTER, III
T. K. JACKSON, III
E. B. PEEBLES, III
F. M. KEELING

TELEPHONE
AREA CODE 203
432-6751

CABLE ADDRESS
SEALAW

May 6, 1969

The Honorable Telfair J. Mashburn, Judge
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Case No. 8307
Obie Lee Salter vs.
Donald Wright

Dear Judge Mashburn:

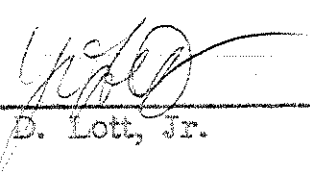
I respectfully request that this matter be continued past its set date of Wednesday, May 14, 1969, as I was informed only today, May 6, 1969, that service had been obtained on Donald Wright on April 18, 1969.

Mrs. Blackmon informed me today that my appearance or formal motion would not be necessary under the circumstances, and I certainly appreciate this consideration.

Yours very truly,

ARMBRECHT, JACKSON & DeMOUY

By


Y. D. Lott, Jr.

YDL/wh

cc: Mrs. Alice Duck ✓
Mrs. Blackmon

OBIE LEE SALTER,

Plaintiff,

-vs-

DONALD WRIGHT,

Defendant.

* IN THE CIRCUIT COURT OF
*
* BALDWIN COUNTY, BAY MINETTE,
*
* ALABAMA
*
*
*
* CASE NO. 8307

COMPLAINT

Count One

The Plaintiff claims of the Defendant Donald Wright FIVE THOUSAND FIVE HUNDRED AND NO/100THS (\$5,500.00) DOLLARS as damages for that heretofore on, to-wit: March 16, 1968, the Plaintiff's automobile was being driven along and upon U. S. Highway 98, Baldwin County, which is a public road in Baldwin County, Alabama, at or near the intersection with the unmarked public farm-to-market road that crosses U. S. Highway 98 in the city of Magnolia Springs, Alabama, at or near the same intersection at which is found the Big M Club, and the Defendant did then and there negligently drive another automobile into, upon, and against the Plaintiff's said automobile; and as a proximate consequence thereof the Plaintiff's said automobile was greatly bent, mashed, broken and damaged about its front end and the said automobile has been declared a total loss, hence this suit.

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Plaintiff
1101 Merchants National Bank Building
Mobile, Alabama

By W. Boyd Reeves
W. Boyd Reeves

By Y. D. Lott, Jr.
Y. D. Lott, Jr.

Please serve the Defendant at
Route 1, Summerdale, Alabama

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8307

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DONALD WRIGHT

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

DONALD WRIGHT, Defendant

by OBIE LEE SALTER

Plaintiff

Witness my hand this 6th day of September 1968

Alice J. [Signature] Clerk

24
4/18/69

No. 8307

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

OBIE LEE SALTER

Plaintiffs

vs.

DONALD WRIGHT

Defendants

SUMMONS AND COMPLAINT

Filed Sept. 6, 1968

Alice J. Duck

Clerk

ARMBRECHT, JACKSON & DEMOUY

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Sumner Galy, Clerk

Received In Office

TAYLOR WILKINS

Sheriff

19.....

Sheriff

I have executed this summons

this April 18, 1969

by leaving a copy with

Donald Wright

Sheriff claims 80 miles at

Ten Cents per mile Total \$8.00

TAYLOR WILKINS, Sheriff

BY

Chiddress
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

Charles E. ... Deputy Sheriff


Madore -

OBIE LEE SALTER,)
Plaintiff,) IN THE CIRCUIT COURT OF
-vs-) BALDWIN COUNTY, ALABAMA
DONALD WRIGHT,) AT LAW
Defendant.) CASE NO. 8307

DEMURRER

Comes the Defendant in the above styled cause and demurs to the Bill of Complaint heretofore filed therein and as grounds for said Demurrer, sets out separately and severally as follows:

- 1) The Complaint does not state a cause of action.
- 2) The Complaint is vague, indefinite and uncertain.
- 3) That the Complaint does not show the driver or operator of Plaintiff's automobile.
- 4) Complaint does not show the approximate time of the accident.
- 5) The damage to said automobile is not set out with sufficient certainty.
- 6) Statement that says the automobile has been declared a total loss is a conclusion of the pleader.



Attorney for Defendant

Defendant respectfully demands
trial by Jury.



Attorney for Defendant

FILED

MAY 14 1969

ALICE J. DUCK CLERK
REGISTER

8309

FILED

MAY 14 1969

ALICE J. DUEK CLERK REGISTER

[Handwritten signature]

[Handwritten signature]

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T. K. JACKSON, III
E. B. PEEBLES, III
F. M. KEELING
GEOFFREY V. PARKER
THOMAS M. AMMONS, III

July 30, 1971

Mrs. Eunice P. Blackmon, Clerk
Baldwin County Circuit Court
County Court House
Bay Minette, Alabama 36507

Re: Salter v. Wright
Case No. 8307

Dear Mrs. Blackmon:

We have your letter of July 29, 1971, requesting payment of costs in the amount of \$36.00 in the subject case. We have asked our client to furnish us with these funds and will forward the same as soon as received.


In the meantime, we would appreciate your indulgence in the matter.

Thank you for your cooperation.

Yours very truly,

ARMBRECHT, JACKSON & DeMOUY

BY


W. Boyd Reeves

WBR/msc

CECIL G. CHASON

Attorney at Law

CHARLES H. SIMS III
ASSOCIATE

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535
PHONE 205/943-3171

February 19, 1970

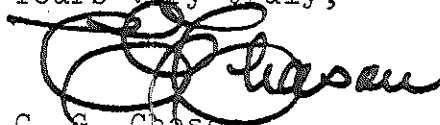
Mrs. Alice J. Duck
Clerk of the Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Salter vs. Wright
Jury Case No. 8307

Dear Mrs. Duck:

I have withdrawn from the above-styled cause many months ago and would appreciate you so indicating on the Docket Sheet. This case is set for trial Tuesday, March 17th.

Yours very truly,


C. G. Chason

CGC/vd

cc: Mr. Y. D. Lott
Donald Wright

FILED

FEB 22 1970

ALICE J. DUCK
CLERK
REGISTER

ARMBRECHT, JACKSON & DEMOUY
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T. K. JACKSON, III
E. B. PEBLES, III
F. M. KEELING

February 27, 1969

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama 36507

Re: Obie Lee Salter v. Donald Wright
Case No. 8307

4-18-69
Dear Mrs. Duck:

I understand that this case was reinstated to the docket on February 27, 1969, by Judge Mashburn at my request. Please advise if this is not correct. I would appreciate a further effort to obtain service on the Defendant at Route 1, Summerdale, near Joe Long's Grocery. Specific directions are as follows:

"From Summerdale, Alabama, proceed south on Highway 59. Turn right on Baldwin County #32 which is also known as Marlow Road. Travel to 4 way stop. At 4 way stop turn left, proceed south and turn left on first paved road to the left. Travel several miles and you will come to the Joe Long's grocery on left hand side of road. Donald Wright lives in 5th house on right after you pass Long's Grocery. His father is known as Mr. Jetty Wright. Wright lives with his parents. Wright is employed as a farm laborer and works for several farmers in the area. Presently he is employed by Mr. Einer Micholson."

Thanks. Best regards.

Sincerely yours,

Brook G. Holmes
Brook G. Holmes

BGH/mls

CC: Sheriff Taylor Wilkins