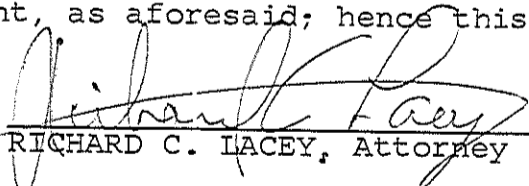


MARY A. GATES,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
VS.	)	AT LAW
MALCOLM R. PITTS,	)	CASE NO. <u>8312</u>
Defendant.	)	

Plaintiff claims of the Defendant the sum of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), damages, for that heretofore and on, to-wit: October 2, 1967, ALLEN PITTS, the son of the Defendant, MALCOLM R. PITTS, did so negligently operate a motor vehicle in a Northerly direction on U. S. Highway No. 98 at a point directly in front of the South entrance to the Daphne Jr. High School, in Daphne, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with an automobile operated by the Plaintiff traveling in a Southerly direction on said highway at said point in front of the Daphne Jr. High School, and as a result of said collision Plaintiff was injured, was made sick and sore; Plaintiff's head was lacerated causing numerous sutures and great pain and permanent scars; Plaintiff's neck, back and arms were so severely injured as to cause her permanent damage and cause much pain and mental anguish to be suffered by the Plaintiff; all to her damage as a result of the negligence of the Defendant, as aforesaid; hence this suit.

  
 RICHARD C. LACEY, Attorney for Plaintiff

Defendant may be served at:

423 Randall Avenue  
 Daphne, Alabama

**FILED**

SEP 11 1968

**ALICE J. DUCK** CLERK  
 REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8312

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Malcolm R. Pitts

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.....

Malcolm R. Pitts

....., Defendant.....

by Mary A. Gates

....., Plaintiff.....

Witness my hand this 11th day of September 1968

Alice J. Duck, Clerk

Ex 9-13-68

No. 8312

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MARY A. GATES

Plaintiffs

vs.

MALCOLM R. PITTS

Defendants

SUMMONS AND COMPLAINT

Filed Sept. 11, 1968

Alice J. Duck Clerk

Richard C. Lacey

Plaintiff's Attorney

Defendant's Attorney

*Daphne*

Defendant lives at

SEP 11 1968

Received in Office

19.....

Sheriff

I have executed this summons

this Sept 13 1968

by leaving a copy with

*Malcolm R. Pitts*  
*Daphne*

Sheriff's Office

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS

BY

DEPUTY SHERIFF

*Layne Wilkins*, Sheriff  
*Roy Randall*, Deputy Sheriff

RICHARD C. LACEY

*Attorney-At-Law*

P. O. DRAWER A-J  
FAIRHOPE, ALABAMA 36532

TELEPHONE 928-2373  
March 25, 1971

Hon. Eunice Blackmon  
Circuit Clerk  
Circuit Court of Baldwin County  
Bay Minette, Alabama

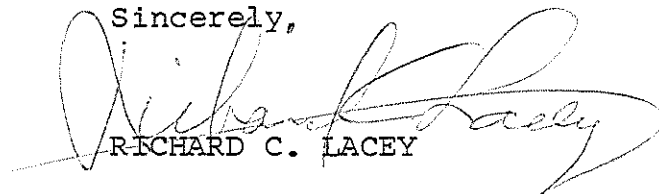
Re: Gates Vs. Pitts-Case No. 8312  
Gates Vs. Pitts-Case No. 8313

Dear Eunice:

Please have the enclosed Garnishments filed against Scott  
Paper Company, Inc.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard C. Lacey", written over a typed name.

RICHARD C. LACEY

RCL/cm  
Encl.