

CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA 36507

JOHN CHASON
NORBORNE C. STONE, JR.
JOHN EARLE CHASON

March 24, 1969

TELEPHONE 937-2191

Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Re: Myrtle H. Hudson vs.
Russell R. Ratcliff
Case No. 8337

We represent the Plaintiff in the above styled cause.
Will you please dismiss the above suit? We are enclosing here-
with a draft for court costs in the sum of \$40.50.

With best regards, we are

Yours very truly,

CHASON, STONE & CHASON

By: 

JC:pjb
Encl: as noted

MYRTLE H. HUDSON,
Plaintiff
Vs.
RUSSELL R. RATCLIFF,
Defendant

* IN THE CIRCUIT COURT OF
BALDWIN
* XXXXXX COUNTY, ALABAMA
* AT LAW
*
CASE NO: 8337
*

NOTICE OF DEPOSITION

TO: Hon. John Chason, Attorney
P. O. Box 120
Bay Minette, Alabama.

A.M.
Please take notice that at 9:30/ on the 30 day of
January, 1969 in the office of Dr. Richard Moore
1729 Springhill Avenue,
situated at Mobile, Alabama, the defendant Russell R. Ratcliff
Moore
will take the deposition of Dr. Richard/, whose address is
Alabama,
1729 Springhill Ave., Mobile, upon oral examination pursuant
to an Act of the Legislature of the State of Alabama, designed
as Act No. 375, Regular Session 1955, Approved September 8, 1955,
before Mr. Charles Howard, an officer authorized to
administer oaths in the County of Mobile, State of Alabama, duly
authorized to take depositions and swear witnesses in said
County, in said State. The oral examination will continue
from day to day until completed and you are invited to attend
and examine the witness.

LYONS, PIPES AND COOK
Attorneys for Defendant.

By: Wesley Pipes

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 27 day of January,
1969, served a copy of the foregoing Notice of Deposition on
counsel for all parties to this proceeding by mailing the same
by United States Mail, properly addressed, and first class
postage prepaid.

Wesley Pipes

FILED

JAN 28 1969

ALICE J. DUCK CLERK
REGISTER

MYRTLE H. HUDSON, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
-vs- :
RUSSELL R. RATCLIFF, : AT LAW
Defendant. : CASE NO. 8337

A N S W E R

COMES NOW the Defendant in the above-entitled cause,
and for answer to the plaintiff's complaint sets down and assigns
the following separately and severally:

1. The allegations of the complaint are untrue.
2. Not guilty.
3. The defendant says that at the time and place
complained of the plaintiff herself was guilty of negligence which
proximately contributed to her alleged injuries and damages in that
at said time and at said place, the intersection of U. S. Highway
90 and Baldwin County Road 27, the plaintiff having undertaken
to keep a lookout for the driver of the automobile in which she
was a passenger, for traffic approaching the intersection from
the east on said Highway 90 as the car in which she was a
passenger attempted to cross said highway 90 on said Baldwin
County Road 27, negligently failed to do so, wherefore the
defendant says that the plaintiff ought not to have and recover
of him.
4. The defendant says that at the time and place
complained of the plaintiff herself was guilty of negligence
which proximately contributed to her alleged injuries and damages
in that at said time and at the intersection of U. S. Highway 90

and Baldwin County Road 27, the plaintiff having undertaken to keep a lookout for the driver of the automobile in which she was a passenger, for traffic approaching the intersection from the east on said Highway 90 as the car in which she was a passenger attempted to cross said highway 90 on said Baldwin County Road 27, did so in such a negligent manner as to cause or allow the driver of said vehicle to enter the intersection when it was not safe to do so, wherefore the defendant says that the plaintiff ought not to have and recover of him.

LYONS, PIPES AND COOK
ATTORNEYS FOR THE DEFENDANT,
Russell R. Ratcliff

By:

Wesley Pipes
Wesley Pipes

~~XXXXXXXXXXXXXXXXXXXX~~

~~xxx~~ J. B. Blackburn
J. B. Blackburn

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 28 day of Feb, 1969.

J. B. Blackburn
Attorney for Defendant

FILED

FEB 28 1969

ALICE J. DUCK

CLERK
REGISTER

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

November 12th, 1968.

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

Re: Myrtle H. Hudson, Plaintiff v.
Russell R. Ratcliff, Defendant.
At Law, Case #8337.

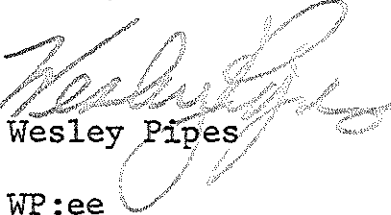
Dear Mrs. Duck:

We enclose herewith notice of deposition addressed to
Hon. John Chason to take the depositions of Myrtle
H. Hudson and Sam Hudson in the above case. Will you
kindly file the same for us.

We have been in touch with Mr. Chason, and he has
agreed to have his clients present and there will be
no need to issue subpoenas.

Very truly yours,

LYONS, PIPES & COOK


Wesley Pipes

WP:ee

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

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JAMES B. KIERCE, JR.

WESLEY PIPES

AREA CODE 205

TEL. 432-4483

P.O. DRAWER 2525

November 12th, 1968.

Mr. John Chason
Chason, Stone & Chason
Attorneys at Law
P. O. Box 120
Bay Minette, Alabama. 36507

Re: Myrtle H. Hudson v. Russell R. Ratcliff.

Dear Mr. Chason:

We have contacted our client and made arrangements for him to be in your office at 10:00 o'clock on November 20th, 1968 to have his deposition taken. Enclosed herewith please find copies of our notice of deposition for Mrs. Hudson and her husband at 10:30 and 11:00 on the same day.

We would appreciate it if we could take the defendant's deposition first in order that he may go back to Florida and not lose as much time from his work.

We have taken the liberty of contacting Mrs. Dusenberry in order that she can take the depositions in your office on the date and at the times set out above. If these arrangements are not satisfactory to you, please let us know in time to make some other arrangements with Mr. Ratcliff.

Very truly yours,

LYONS, PIPES & COOK

Wesley Pipes

WP:ee

MYRTLE H. HUDSON,

Plaintiff

Vs.

RUSSELL R. RATCLIFF,

Defendant

* IN THE CIRCUIT COURT OF

* MOBILE COUNTY, ALABAMA

* AT LAW

*

CASE NO: 8337

*

NOTICE OF DEPOSITION

TO: Hon. John Chason

Attorney at Law

P. O. Box 120

Bay Minette, Alabama 36507

11:00 A.M.

Please take notice that at ~~20th~~ on the 20th day of November, 1968 in the office of Chason, Stone & Chason situated at Bay Minette, Alabama the defendant Russell R. Ratcliff will take the deposition of Myrtle H. Hudson whose address is 701 Brady Rd., Bay Minette upon oral examination pursuant to an Act of the Legislature of the State of Alabama, designed as Act No. 375, Regular Session 1955, Approved September 8, 1955, before Mrs. Louis Dusenberry, an officer authorized to administer oaths in the County of Mobile, State of Alabama, duly authorized to take depositions and swear witnesses in said County, in said State. The oral examination will continue from day to day until completed and you are invited to attend and examine the witness.

LYONS, PIPES AND COOK
Attorneys for Defendant.

By: Wesley Pipes

Wesley Pipes

C E R T I F I C A T E O F S E R V I C E

I do hereby certify that I have on this 12 day of Nov., 1968, served a copy of the foregoing Notice of Deposition on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

Wesley Pipes

FILED

NOV 15 1968

ALICE J. DUCK

CLERK
REGISTER

MYRTLE H. HUDSON,

Plaintiff

Vs.

RUSSELL R. RATCLIFF,

Defendant

* IN THE CIRCUIT COURT OF

* MOBILE COUNTY, ALABAMA

* AT LAW

*

CASE NO: 8337

*

NOTICE OF DEPOSITION

TO: Hon. John Chason
Attorney at Law
P.O. Box 120
Bay Minette, Alabama 36507

Please take notice that at 10:30A.M. on the 20th day of
November, 1968 in the office of Chason, Stone & Chason
situated at Bay Minette, Alabama the defendant Russell R. Ratcliff
will take the deposition of Mr. Sam Hudson whose address is
701 Brady Rd., Bay Minette upon oral examination pursuant
to an Act of the Legislature of the State of Alabama, designed
as Act No. 375, Regular Session 1955, Approved September 8, 1955,
before Mrs. Louis Dusenberry, an officer authorized to
administer oaths in the County of Mobile, State of Alabama, duly
authorized to take depositions and swear witnesses in said
County, in said State. The oral examination will continue
from day to day until completed and you are invited to attend
and examine the witness.

LYONS, PIPES AND COOK
Attorneys for Defendant.

By: Wesley Pipes

Wesley Pipes

C E R T I F I C A T E O F S E R V I C E

I do hereby certify that I have on this 12 day of Nov.,
1968, served a copy of the foregoing Notice of Deposition on
counsel for all parties to this proceeding by mailing the same
by United States Mail, properly addressed, and first class
postage prepaid.

Wesley Pipes
Wesley Pipes

FILED

NOV 18 1968

ALICE J. DUCK CLERK
RECLINER

MYRTLE H. HUDSON,

Plaintiff

Vs.

RUSSELL R. RATCLIFF,

Defendant

*

*

*

*

*

IN THE CIRCUIT COURT OF
BALDWIN

~~MOBILE~~ COUNTY, ALABAMA

AT LAW

CASE NO: 8337

NOTICE OF DEPOSITION

TO: Hon. John Cason, Attorney at Law
P. O. Box 120
Bay Minette, Alabama.

Please take notice that at 9:30 A.M. on the 8th day of
January, 1969, 19 in the office of Dr. A. V. Mortenson
1367 Government Street
situated at Mobile, Alabama the defendant Russell R. Ratcliff
Dr. A. V.
will take the deposition of Mortenson, whose address is
1367 Government
Street, Mobile, Alabama, upon oral examination pursuant
to an Act of the Legislature of the State of Alabama, designed
as Act No. 375, Regular Session 1955, Approved September 8, 1955,
before Mrs. Dorothy Leamy, an officer authorized to
administer oaths in the County of Mobile, State of Alabama, duly
authorized to take depositions and swear witnesses in said
County, in said State. The oral examination will continue
from day to day until completed and you are invited to attend
and examine the witness.

LYONS, PIPES AND COOK
Attorneys for Defendant.

By: Wesley Pipes

Wesley Pipes

C E R T I F I C A T E O F S E R V I C E

I do hereby certify that I have on this 4 day of January,
1969, served a copy of the foregoing Notice of Deposition on
counsel for all parties to this proceeding by mailing the same
by United States Mail, properly addressed, and first class
postage prepaid.

Wesley Pipes
Wesley Pipes

NOTICE TO CLERK: Please issue subpoena for the witness to
appear at the time and place aforesaid.

FILED

JAN 6 1969

Wesley Pipes
Wesley Pipes

ALICE L. DUCK CLERK
REGISTER

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

October 19, 1968

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

Re: Myrtle H. Hudson, plaintiff vs.
Russell R. Ratcliff, defendant
At Law, Case No: 8337

Dear Mrs. Duck:

Enclosed please find demurrers in the above styled case which we ask that you file with the Court on behalf of the defendant. Please stamp our file copy with the date and time and return same to us in the enclosed self-addressed, stamped envelope.

Yours truly,

LYONS, PIPES AND COOK

Wesley Pipes
Wesley Pipes

WP/lak

Enclosures


MYRTLE H. HUDSON,	X		
		IN THE CIRCUIT COURT OF	
Plaintiff,	X		
		BALDWIN COUNTY, ALABAMA	
vs.	X		
		AT LAW	NO: 8337
RUSSELL R. RATCLIFF,	X		
Defendant.	X		

DEMURRER

Comes the Plaintiff in the above styled cause and demurs to Pleas 3 and 4 of the Answer filed by the Defendant in said cause, separately and severally, and assigns the following separate and several grounds, viz:

1. That said Pleas do not state any defense to the cause of action.
2. That said Pleas state that the Plaintiff was guilty of negligence which proximately contributed to her alleged injuries but do not state that such negligence was the proximate cause of her injuries.
3. The allegation that the Plaintiff had undertaken to keep a lookout for the driver of the automobile in which she was a passenger for traffic approaching from the East is but a conclusion of the pleader and does not state facts sufficient to charge her with negligence.
4. That said Pleas do not set out sufficient facts to charge the Plaintiff with contributory negligence.
5. That said Pleas attempt to set out the quo modo of the Plaintiff's negligence without setting out sufficient facts, as a matter of law, to charge her with contributory negligence.
6. It fails to appear from such Pleas when or in what manner the Plaintiff undertook to keep a lookout for the driver of the automobile in which she was a passenger for traffic

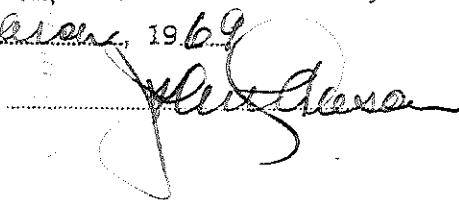
approaching the intersection from the East and how and in what manner she negligently failed to do so.


Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 1 day

of March, 1969



FILED

MAR 3 1969

ALICE J. DUCK CLERK
REGISTER

FILED

8337

MAR 3 1969

ALICE J. DUCK CLERK
REGISTER

MYRTLE H. HUDSON,

Plaintiff,

VS.

RUSSELL R. RATCLIFF,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO: 8337

* * * * *

DEMURRER

* * * * *

CIVIL SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred. BT-12-46-250

The State of Alabama,
Baldwin County.

CIRCUIT COURT

Case No. 8337 Term, 194

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon

Dr. A. V. Mortensen
1367 Governorment St,
Mobile

if to be found in your County, at the instance of the

in the office of Dr. A. V. Mortensen - 1367 Govt St
to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House

thereof, by 9:30 o'clock of the forenoon, on the 8th day of January, 1949.

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein Myrtle H. Hudson Plaintiff

and Russell B. Patchell Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 6 day of Jan, 1949

Reverend Clerk.

Ex: 1-7-69

Received in office this..... day of

JAN 6 1963

1969

~~WILLIAMS~~

SHERIFF.

I have executed this writ:

1-7-69

by serving a copy on
Mr. A. W. Mortensen

SHERIFF.

Ray D. Bridges

By: W.C. Lewis D'S.

ORIGINAL

No. 8337

Page

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Myrtle H. Hudson

Plaintiff.

VS.

Russell B. Ratcliff

Defendant.

CIVIL SUBPOENA

Issued this..... day of

Jan

1969

Rice & Rice

Clerk.

MYRTLE H. HUDSON
Plaintiff

vs

RUSSELL R. RATCLIFF
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8337

FILED

OCT 21 1968

8:00 P.M.

ALICE J. DUCK CLERK
REGISTER

Comes now the defendant in the above entitled cause, and demurs to the plaintiff's complaint, and to each count thereof, separately and severally, and as grounds for said demurrer sets down and assigns the following, separately and severally:

1. Said count fails to allege the violation of any duty owed by the defendant to the plaintiff.
2. Said count fails to allege facts showing the violation of any duty owed by the defendant to the plaintiff.
3. For aught that appears from said count, the accident did not occur on a public street.
4. For aught that appears from said count, the plaintiff was not at a place where she had a legal right to be at the time and place complained of.
5. For aught that appears from said count, the injuries and damages suffered by the plaintiff were not the proximate result of any act or failure to act on the part of the defendant.
6. For that said count fails to allege any causal connection between the alleged negligence of this defendant and the alleged damages of the plaintiff.
7. For that the willful or wanton act alleged in said count characterized the act and not the injury.
8. For that said count fails to allege facts showing willfulness or wantonness on the part of the defendant.

LYONS, PIPES AND COOK
Attorneys for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 19th day of October, 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 paid.

By: 

Walter M. Cook

September 27, 1968

MYRTLE H. HUDSON, Plaintiff

VS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA AT
LAW

RUSSELL R. RATCLIFF, Defendant

CASE NO. 8337

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Mabel Amos, Secretary of State, hereby certify that on
I sent by certified mail in an envelope addressed as follows:

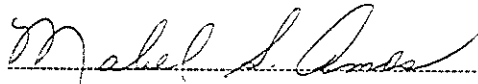
“

Russell R. Ratcliff
684 Grand View Avenue
Valparaiso, Florida 32580”“Certified Mail—
Return Receipt Requested
Deliver to Addressee Only”bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of
the State of Alabama in words and figures as follows:

“

Russell R. Ratcliff
684 Grand View Avenue
Valparaiso, Florida 32580You will take notice that on September 23, 1968 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: MYRTLE H. HUDSON, Plaintiff VS RUSSELL R. RATCLIFF, Defendantin the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 8337 a true copy of which summons and complaint is 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.WITNESS MY HAND and the Great Seal of the State of Alabama this the 23rd
day of September, 1968.

Enclosure (1)

(Signed) Mabel Amos
Secretary of State”I further certify 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 in the above-styled
cause.I further certify that on September 27, 1968 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Valparaiso, Fl.
on September 26, 1968.WITNESS MY HAND and the Great Seal of the State of Alabama this the 27th day
of September, 1968.Mabel Amos
Secretary of StateEnclosures: Return Receipt Card and copy
of Summons and Complaint.CC: Honorable John Chason
157 Hoyle Avenue
Bay Minette, Alabama 36507

STATE OF ALABAMA

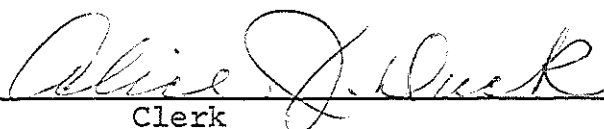
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Russell R. Ratcliff 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 Myrtle H. Hudson.

Witness my hand this 20 day of September, 1968.


Clerk

MYRTLE H. HUDSON,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

vs.

X

X

AT LAW

RUSSELL R. RATCLIFF,

X

8337

Defendant.

X

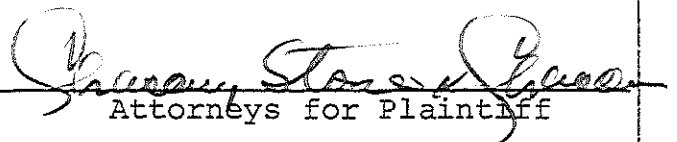
COUNT ONE

The Plaintiff claims of the Defendant the sum of Nine Thousand Nine Hundred Ninety-nine Dollars (\$9,999.00) as damages for that on, to-wit: May 10, 1968 at a point on U. S. Highway 90 at the intersection of County Road 27 at Malbis in Baldwin County, Alabama, the Defendant negligently drove an automobile into or against the motor vehicle in which the Plaintiff was riding as a passenger and as a proximate result of the negligence of such Defendant, the Plaintiff was injured in this: she received a severe cerebral concussion; severe contusions of the chest and

abdomen, some of her ribs being fractured or broken; she was knocked unconscious and remained unconscious for several days; she completely lost her eye sight for several days and her sight has been permanently impaired; she suffered severe pain and mental anguish; she was caused to incur large medical and hospital expenses and she has been permanently injured, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant the sum of Nine Thousand Nine Hundred Ninety-nine Dollars (\$9,999.00) as damages for that on, to-wit: May 10, 1968 at a point on U. S. Highway 90 at the intersection of County Road 27 at Malbis in Baldwin County, Alabama, the Defendant wilfully or wantonly injured the Plaintiff by wilfully or wantonly driving an automobile into or against the motor vehicle in which the Plaintiff was riding as a passenger and as a proximate result of the wilful or wanton negligence of such Defendant, the Plaintiff was injured in this: she received a severe cerebral concussion; severe contusions of the chest and abdomen, some of her ribs being fractured or broken; she was knocked unconscious and remained unconscious for several days; she completely lost her eye sight for several days and her sight has been permanently impaired; she suffered severe pain and mental anguish; she was caused to incur large medical and hospital expenses and she has been permanently injured, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.


Attorneys for Plaintiff

The Plaintiff demands a trial of this cause by a jury.


Attorneys for Plaintiff

FILED

SEP 20 1968

250

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA

AFFIDAVIT

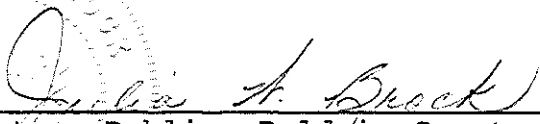
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That he is one of the attorneys for the Plaintiff, Myrtle H. Hudson, in the above styled cause. That he is informed and believes and upon such information and belief alleges that the Defendant, Russell R. Ratcliff, is a non-resident of the State of Alabama, residing at 684 Grand View Avenue, Valparaiso, Florida. That this affidavit is being made for the purpose of securing service of process on the Defendant, Russell R. Ratcliff, under and by virtue of the provisions of Title 7, Section 199 of the Code of Alabama of 1940, As Amended.


John Chason

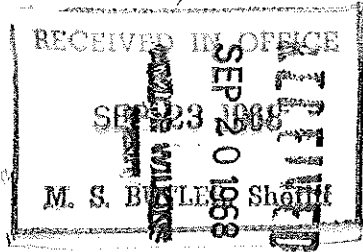
Sworn to and subscribed before me
this 20th day of September, 1968.


Notary Public, Baldwin County, Alabama.

FILED

SEP 20 1968

ALICE J. DUCK CLERK
REGISTER



Executed by serving 3 copies of
the within on Mable Amos
Secretary of State of The State of
Alabama.

This the 23 day of Sept 1968

Sheriff of Montgomery County

M. S. Butler

By W. L. Mason D. S.

M. S. Butler, Sheriff of Montgomery
County, Alabama, Claim \$1.50 each for
serving 1 process(es) and \$1.00
travel expense on each of 1
process(es) or a total of \$2.50

W. L. Mason Deputy Sheriff

MYRTLE H. HUDSON,

Plaintiff,

vs.

RUSSELL R. RATCLIFF,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED

SEP 20 1968

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

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

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

655-16-71548-9

POD Form 3811 June 1966



POSTMARK OF
DELIVERING OFFICE

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.

NAME OF SENDER

STREET AND NO. OR P.O. BOX

POST OFFICE, STATE, AND ZIP CODE

RECEIVED
SEP 27 1968
TO
SECRETARY OF STATE
MONTGOMERY, ALABAMA

26104

MYRTLE H. HUDSON VS RUSSELL R. RATCLIFF (8337)

INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Show to whom and date delivered

☐ 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.

SIGNATURE OR NAME OF ADDRESSEE *(Must always be filled in)*

CERTIFIED NO.

51435

1

Russell R. Ratcliff

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

2

INSURED NO.

DATE DELIVERED

SHOW WHERE DELIVERED *(only if requested)*

9/26/68