

LYONS, PIPES and COOK  
ATTORNEYS-AT-LAW  
2510 FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA 36601

JOSEPH H. LYONS. (1900-1957)  
SAM W. PIPES, III  
WALTER M. COOK  
GORDON B. KAHN  
IRWIN W. COLEMAN, JR.  
G. SAGE LYONS  
AUGUSTINE MEAHER, III  
JAMES B. KIERCE, JR.  
WES PIPES

AREA CODE 205  
TELEPHONE 432-4483  
P. O. DRAWER 2525

October 15, 1968

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

Re: Willie C. Scott, plaintiff vs.  
David C. Boyd, Sr., defendant

Dear Mrs. Duck:

Enclosed is the original and one copy of a complaint  
filed by us for Willie C. Scott in the above referenced  
matter, and we ask you to please file this case in your  
Court.

Please advise us when service is had in this matter.

Very truly yours,

LYONS, PIPES AND COOK

*Norton Brooker, Jr.*  
Norton Brooker, Jr.

NB/lak  
(3565)

Enclosures

LYONS, PIPES & COOK  
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October 15, 1968

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

Re: Willie C. Scott, plaintiff vs.  
David C. Boyd, Sr., defendant

Dear Mrs. Duck:

*708375*

Enclosed is the original and one copy of a complaint  
filed by us for Willie C. Scott in the above referenced  
matter, and we ask you to please file this case in your  
Court.

Please advise us when service is had in this matter.

Very truly yours,

LYONS, PIPES AND COOK

*Norton Brooker, Jr.*  
Norton Brooker, Jr.

NB/lak  
(3565)

Enclosures

WILLIE C. SCOTT  
Plaintiff  
VS:  
DAVID C. BOYD, SR.  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, CASE NO. 8375

WRIT OF DISCOVERY

TO DAVID C. BOYD, SR. Rt. 1, Box 50-A, Daphne, Alabama 36526

TAKE NOTICE, THAT, WHEREAS THE PLAINTIF IN THE ABOVE ENTITLED CAUSE HAS REQUESTED IN WRITING, THE UNDERSIGNED, AS CLERK OF SAID COURT TO ISSUE NOTICE TO YOU AS DEFENDANT IN THE ABOVE ENTITLED CAUSE AND IN THE JUDGEMENT THEREIN, REQUIRING YOU TO FILE THE STATEMENT IN WRITING UNDER OATH OF ALL YOUR ASSETS, AS PROVIDED IN THE ACT OF THE LEGISLATURE OF ALABAMA, APPROVED SEPTEMBER 28, 1915, "TO PROVIDE FOR THE DISCOVERY OF ASSETS OF JUDGEMENT DEBTORS, AND TO FACILITATE THE ENFORCEMENT OR COLLECTION OF JUDGEMENTS IN COURTS OF LAW AND EQUITY IN THIS STATE," AND HAS FILED SAID REQUEST, IN WRITING, IN THIS CAUSE ENDORSED "NO PROPERTY FOUND" BY THE SHERIFF OF BALDWIN COUNTY, AND THAT YOU RESIDE IN THE STATE OF ALABAMA.

NOW THEREFORE, YOU, THE SAID David C. Boyd, Sr., ARE HEREBY REQUIRED, WITHIN 30 DAYS FROM THE SERVICE HEREOF, TO FILE IN THIS COURT A STATEMENT, IN WRITING, UNDER OATH, OF ALL YOUR ASSETS, INCLUDING MONEY, CHOSSES IN ACTION, NOTES, BONDS AND ACCOUNTS, AND ALL OTHER PROPERTY, REAL, PERSONAL OR MIXED, OR ANY INTERESTS THEREIN, WITH A DETAILED DESCRIPTION OF THE SAME, THE LOCATION AND REASONABLE VALUE OF EACH ITEM THEREOF, TOGETHER WITH A DETAILED LIST OR STATEMENT, OF ANY AND ALL LENDS, MORTGAGES OR ENCUMBRANCES THEREON.

WITNESS MY HAND THIS 15th DAY OF August,  
19 69.

CLERK

\*\*\*\*\*

TO ANY SHERIFF IN THE STATE OF ALABAMA: GREETINGS.

YOU ARE HEREBY COMMANDED TO SERVE THE FOREGOING NOTICE UPON THE ABOVE NAMED David C. Boyd, Sr. AND MAKE DUE RETURN OF YOUR SAID SERVICE AND OF THIS NOTICE.

CLERK

291. A.

WILLIE C. SCOTT

Plaintiff,

vs:

DAVID C. BOYD, SR.,

Defendant

WRIT OF DISCOVERY

LYONS, PIPES & COOK

Sheriff claims 44 miles at  
Ten Cents per mile Total \$ 4.40  
TAYLOR WILKINS, Sheriff  
BY Pardoll  
DEPUTY SHERIFF

By service on \_\_\_\_\_

Received 15 day of August 1969  
and on 25 day of Aug. 1969  
I served a copy of the within Writ of Discovery  
on David C. Boyd, Jr.

R.T. 1 Box 50 Dayline

TAYLOR WILKINS, Sheriff  
By Pardoll D.S.  
W. Boyd D.

12-23-68

LYONS, PIPES & COOK  
ATTORNEYS AT LAW  
2510 FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA  
36601

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JAMES B. KIERCE, JR.  
WESLEY PIPES  
NORTON W. BROOKER, JR.

AREA CODE 205  
TEL. 432-4483  
P. O. DRAWER 2525

August 14, 1969

8375  
Mrs. Alice J. Duck  
Clerk, Circuit Court  
Baldwin County Courthouse  
Bay Minette, Alabama 36507

Re: Willie C. Scott vs. David C. Boyd, Sr.

Dear Mrs. Duck:

We understand that execution in the above referenced matter has been returned NO PROPERTY FOUND and we would appreciate your issuing a writ of discovery to the defendant.

Defendant's address is David C. Boyd, Sr., Route 1, Box 50-A, Daphne, Alabama 36526.

Very truly yours,

LYONS, PIPES AND COOK

*Norton Brooker Jr.*  
Norton Brooker, Jr.

NB/lak

issued 8-15-69

LYONS, PIPES & COOK

ATTORNEYS AT LAW

2510 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)

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NORTON W. BROOKER, JR.

36601

AREA CODE 205  
TEL. 432-4483  
P.O. DRAWER 2525

February 25, 1969

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

Re: Willie C. Scott vs. David C. Boyd, Sr.  
Case No. 8375

Dear Mrs. Duck:

As sixty days have expired since a judgment by default was entered in the above referenced matter against David C. Boyd, Sr. in the amount of \$2550.00 plus cost of court of \$30.50, we would appreciate your certifying a copy of such judgment to the Director of Public Safety of the State of Alabama, under the provisions of Title 36, Sec. 74(53).

Please forward the enclosed letter to the Department of Public Safety when the certificate of judgment is certified to Montgomery.

If there is any charge for this, please advise.

Very truly yours,

LYONS, PIPES AND COOK

*Norton Brooker, Jr.*  
Norton Brooker, Jr.

NB:kth

*Done  
2-26-69*

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 8375

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon .....

David C. Boyd, Sr

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.....

David C. Boyd, Sr ..... Defendant.....

by ..... Willie C. Scott .....

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

Witness my hand this.....17.....day of.....Oct.....19...68

*Alice J. Luck*, Clerk

E4:10-18-68

No. 8375

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WILLIE C. SCOTT

Plaintiffs

vs.

DAVID C. BOYD Sr.

Defendants

SUMMONS AND COMPLAINT

Filed 10-17-1968

Alice J. Duck

Clerk

Lyons, Pipes & Cook

Plaintiff's Attorney

Defendant's Attorney

Defendant's Office  
RECEIVED

OCT 17 1968

Received in Office  
CLERK

19.....

Sheriff

I have executed this summons

this 10 of 18 1968

by leaving a copy with

David C. Boyd, Sr.

Shambo Sta

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Roy Randall  
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

Roy Randall, Deputy Sheriff

RT 1 Box 50 A

wanton conduct of the defendant as aforesaid, plaintiff's automobile was bent, broken, smashed and otherwise rendered permanently less valuable and plaintiff was permanently deprived of the use thereof, all to plaintiff's damages as aforesaid, and for all of which plaintiff brings this suit.

LYONS, PIPES AND COOK  
Attorneys for Plaintiff

By: Norton Brooker, Jr.  
Norton Brooker, Jr.

Defendant may be served as follows:

David C. Boyd, Sr.  
Route 1, Box 50 A  
Daphne, Alabama.

FILED

OCT 17 1968

ALICE J. DUCK CLERK  
REGISTER

WILLIE C. SCOTT,                                 )    IN THE CIRCUIT COURT OF  
                    Plaintiff,                         )    BALDWIN COUNTY, ALABAMA  
Vs.   )  
DAVID C. BOYD, SR.                                 )  
                    Defendant.                         )    CASE NO: 8375

COUNT ONE

The plaintiff claims of the defendant the sum of THREE THOUSAND AND NO/100 (\$3,000.00) DOLLARS as damages for that on, to-wit, May 25, 1968, the defendant so negligently operated an automobile on United States Highway 90, a public highway in Baldwin County, Alabama, approximately 1.5 miles East from the center of the City of Spanish Fort, Alabama; that the said automobile then and there operated by the defendant collided with the plaintiff's vehicle which was then and there being operated on said public highway. Plaintiff further avers as a proximate result of the negligence of the defendant as aforesaid, the plaintiff's automobile was bent, broken, smashed and otherwise rendered permanently less valuable and the plaintiff was permanently deprived of the use thereof all to plaintiff's damage as aforesaid, and for all of which plaintiff brings this suit.

COUNT TWO

Plaintiff claims of the defendant the sum of THREE THOUSAND AND NO/100 (\$3,000.00) DOLLARS as damages for that on, to-wit, May 25, 1968 the defendant wantonly damaged the plaintiff by wantonly driving an automobile into and against the plaintiff's automobile which was then and there being operated on United States Highway 90, a public highway in Baldwin County, Alabama, approximately 1.5 miles from the center of the City of Spanish Fort, Alabama. Plaintiff avers that as a proximate result of the said