

ORIGINAL

THE STATE OF ALABAMA }
Montgomery County
Baldwin

To any Sheriff of the State of Alabama—GREETING:

You are Hereby Commanded to Summon

BOBBY LEE STEWART

to appear for the Circuit Court of Baldwin in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of

GEORGE HENRY THOMAS, JR.

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this 12 day of December 1968
Alice J. Duck Clerk

COMPLAINT

THE STATE OF ALABAMA

Montgomery, Alabama
Bay Minette,

George Henry Thomas, Jr.

Plaintiff

VS.

In the Circuit Court of Baldwin
Montgomery County

Bobby Lee Stewart

Defendant

The plaintiff claim of the Defendant the sum of Twenty-five Thousand and 00/100 (\$25,000.00) Dollars as damages for that heretofore, on, to-wit: September 7, 1968, while the plaintiff was driving an automobile on CO-47, a public highway in the City of Bay Minette, County of Baldwin, State of Alabama, the defendant so negligently operated an automobile that he ran into, on, or against the automobile which the plaintiff was operating and as a proximate result and consequence of the negligence aforesaid, the plaintiff was negligently injured and damaged as follows: Plaintiff's automobile was practically demolished, his automobile was bent, bruised, and broken, the frame on plaintiff's automobile was bent, and the reasonable market value of said automobile was greatly reduced; plaintiff was greatly injured in his person; his left leg was broken in two places, his right ankle, left hand and face were cut, two of his teeth were knocked out, he was torn, lacerated and otherwise injured internally and externally and suffered and continues to suffer great mental and physical pain and anguish and was rendered likely to be caused to so suffer in the future, and his health and physical stamina were greatly and permanently impaired and his life was endangered, and plaintiff was caused to spend large sums of money in and about the treatment of said injuries for hospital, medical and doctor bills, and plaintiff lost time from his employment all to plaintiff's damage, wherefore he sues.

COUNT II

The plaintiff claims of the defendant the sum of Twenty-five Thousand and 00/100 (\$25,000.00) Dollars as damages for that heretofore, on, to-wit: September 7, 1968, while the plaintiff was driving an automobile on CO-47, a public highway in the City of Bay Minette, County of Baldwin, State of Alabama, the defendant so wantonly operated an automobile that he ran into,

M.F.

ALICE J. DUECK
CLERK
REGISTER

DEC 12 1968

FILED

Attorney for Plaintiff

[Signature]

Plaintiff demands a trial by jury.

Attorney for Plaintiff

[Signature]

The plaintiff claims of the defendant the sum of Twenty-five Thousand and 00/100 (\$25,000.00) Dollars as damages for that heretofore, on, to-wit: September 7, 1968, while the plaintiff was driving an automobile on CO-47, a public highway in the City of Bay Minette, County of Baldwin, State of Alabama, the defendant so willfully operated an automobile that he ran into, or, or against the automobile which the plaintiff was driving and as a proximate result and consequence of the willfulness aforesaid, the plaintiff was willfully injured and damaged as follows: Plaintiff's automobile was practically demolished, his automobile was bent, bruised, and broken, the frame on plaintiff's automobile was bent, and the reasonable market value of said automobile was greatly reduced; plaintiff was greatly injured in his person; his left leg was broken in two places, his right ankle, left hand and face were cut, two of his teeth were knocked out, he was torn, lacerated and otherwise injured internally and externally, and suffered and continues to suffer great mental and physical pain and anguish and was rendered likely to be caused to so suffer in the future, and his health and physical stamina were greatly and permanently impaired and his life was endangered, and plaintiff was caused to spend large sums of money in and about the treatment of said injuries for hospital, medical and doctor bills, and plaintiff lost time from his employment all to plaintiff's damage, wherefore he sues.

COUNT III

on or against the automobile which the plaintiff was driving and as a proximate result and consequence of the wantonness aforesaid the plaintiff was wantonly injured and damaged as follows: Plaintiff's automobile was practically demolished, his automobile was bent, bruised and broken, the frame on plaintiff's automobile was bent, and the reasonable market value of said automobile was greatly reduced; plaintiff was greatly injured in his person; his left leg was broken in two places, his right ankle, left hand and face were cut, two of his teeth were knocked out, he was torn, lacerated and otherwise injured internally and externally, and he suffered and continues to suffer great mental and physical pain and anguish and was rendered likely to be caused to so suffer in the future, and his health and physical stamina were greatly and permanently impaired and his life was endangered, and plaintiff was caused to spend large sums of money in and about the treatment of said injuries for hospital, medical and doctor bills, and plaintiff lost time from his employment all to plaintiff's damage, wherefore he sues.

Returned 8 day of Jan 1968
Not found in my county after diligent search and inquiry.

Taylor Wilkins Sheriff
by W A Zellner Deputy Sheriff
In hospital
in mobile

PAGE 696

Executed by serving
of the within. Summons and Complaint on
Defendant this the
19 day of
19 Sheriff

Received in office
DEC 12 1968
19 day of
Sheriff

ORIGINAL
No. 82/68

GEORGE HENRY THOMAS, JR.

vs.

BOBBY LEE STEWART
Rabun Rt.
Bay Minette, Alabama

CIRCUIT COURT
BALDWIN
OF MONTGOMERY COUNTY
Term, 19

SUMMONS AND

COMPLAINT

Filed in office this
DEC 12 1968
A. D. 19
day of

L. H. Walden
224 Bibb Street
Montgomery, Ala.
263-3942 or 265-8731
Plaintiff's Attorney

Baldwin
Clerk, Circuit Court, Montgomery County.

WITNESS my hand this
day of
A. D. 19
The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the defendant give bond, payable to the Plaintiff, with security in double value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

THE STATE OF ALABAMA
Montgomery County
Baldwin
To the Sheriff of Said County—GREETINGS:

L. H. WALDEN
ATTORNEY AND COUNSELLOR AT LAW
224 BIBB STREET
MONTGOMERY, ALABAMA 36104

February 23, 1970

Mrs. Alice J. Duck
Register, Circuit Court
Bay Minette, Alabama

Re: Case No. 8465
Thomas vs. Stewart

Dear Mrs. Duck:

Please dismiss the above styled case as it has been settled.

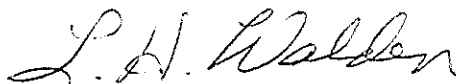
Please send me a statement that this case has been dismissed by the Court, this letter being authority to have the case dismissed with prejudice to the Plaintiff.

I would like very much for you to send me a statement that this case has been dismissed so that I can turn it over to the Insurance Company for their files.

At the same time please send me a bill of costs which will be promptly paid.

I appreciate your kindness and consideration shown me in this case.

Very truly yours,



L.H. Walden

LHW/jb

THE STATE OF ALABAMA

Montgomery County

Baldwin

To any Sheriff of the State of Alabama—GREETING:

You are Hereby Commanded to Summon

BOBBY LEE STEWART

to appear for the Circuit Court of Baldwin, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of

GEORGE HENRY THOMAS, JR.

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this 12 day of

December

1968

Alice D. Huerfano
Clerk.

COMPLAINT

THE STATE OF ALABAMA

Montgomery, Alabama
Bay Minette,

George Henry Thomas, Jr.

Plaintiff

VS.

Bobby Lee Stewart

Defendant

In the Circuit Court of Baldwin
Montgomery
County

Term, 19

The plaintiff claim of the Defendant the sum of Twenty-five Thousand and 00/100 (\$25,000.00) Dollars as damages for that heretofore, on, to-wit: September 7, 1968, while the plaintiff was driving an automobile on CO-47, a public highway in the City of Bay Minette, County of Baldwin, State of Alabama, the defendant so negligently operated an automobile that he ran into, on, or against the automobile which the plaintiff was operating and as a proximate result and consequence of the negligence aforesaid, the plaintiff was negligently injured and damaged as follows: Plaintiff's automobile was practically demolished, his automobile was bent, bruised, and broken, the frame on plaintiff's automobile was bent, and the reasonable market value of said automobile was greatly reduced; plaintiff was greatly injured in his person; his left leg was broken in two places, his right ankle, left hand and face were cut, two of his teeth were knocked out, he was torn, lacerated and otherwise injured internally and externally and suffered and continues to suffer great mental and physical pain and anguish and was rendered likely to be caused to so suffer in the future, and his health and physical stamina were greatly and permanently impaired and his life was endangered, and plaintiff was caused to spend large sums of money in and about the treatment of said injuries for hospital, medical and doctor bills, and plaintiff lost time from his employment all to plaintiff's damage, wherefore he sues.

COUNT II

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Received in office day of

RECEIVED

19

DEC 12 1963

OFFICE HARRIS

Sheriff

Executed by serving cop

of the within. Summons and Complaint on

Defendant this the day of

19

Sheriff

No.

GEORGE HENRY THOMAS, JR.

vs.

BOBBY LEE STEWART
Rabun Rt.
Bay Mintete, Alabama

CIRCUIT COURT

BALDWIN

OF MONTGOMERY COUNTY

Term, 19

SUMMONS AND

COMPLAINT

Filed in office this

DEC 12 1963

day of

A. D. 19

ALICE J. BERRY

Clerk.

L. H. Walden
224 Bibb Street
Montgomery, Ala. Plaintiff's Attorney
263-3942 or 265-8731

THE STATE OF ALABAMA

Baldwin
Montgomery County

To the Sheriff of Said County—GREETINGS:

The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the defendant give bond, payable to the Plaintiff, with security in double value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

WITNESS my hand and this

day of

A. D. 19

Baldwin
Clerk, Circuit Court, Montgomery County.

L. H. WALDEN
ATTORNEY AND COUNSELLOR AT LAW
58 COMMERCE STREET
MONTGOMERY, ALABAMA 36104

December 11, 1968

Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama

Re: George H. Thomas, Jr.
vs.
Bobby Lee Stewart

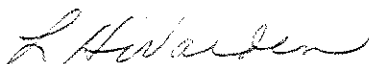
8465

Dear Sir:

Please file the enclosed summons and complaint, and
advise me the date same is set for trial.

Your cooperation in this matter will be appreciated.

Yours very truly,


L. H. Walden

LHW/jlw

L. H. WALDEN
ATTORNEY AND COUNSELLOR AT LAW
224 BIBB STREET
MONTGOMERY, ALABAMA 36104

August 27, 1969

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

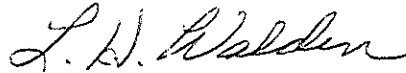
Re: Case No. 8465
Thomas vs. Stewart

Dear Mrs. Duck:

In reference to the above styled case, I would like to get this passed as my client is in England at the present time and I am in the process of settling this case with an adjuster.

Thanking you for your cooperation in this matter, I remain,

Yours very truly,



L.H. Walden

LHW/jb

FILED

AUG 26 1969

ALICE J. DUCK
CLERK
B. J. 152