

ORIGINAL

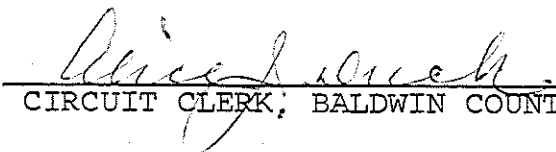
S U M M O N S

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE
STATE OF ALABAMA

You are hereby commanded to summon Richard L. Beery to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Dee Theresa Olson, Fairhope, Alabama.

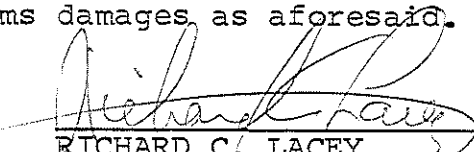
WITNESS my hand this 30 day of Dec, 1968


CIRCUIT CLERK, BALDWIN COUNTY

DEE THEREAS OLSON,)	IN THE CIRCUIT COURT OF BALDWIN
Plaintiff,)	COUNTY, ALABAMA
VS.)	AT LAW
RICHARD L. BEERY,)	CASE NO. <u>8483</u>
Defendant)	

COUNT ONE

The Plaintiff claims of the Defendant Ten Thousand Dollars (\$10,000.00), as damages, for heretofore and on, to-wit, the 5th day of January, 1968, the Defendant so negligently operated a motor vehicle on one of the public highways in the State of Alabama, to-wit, Battleship Parkway, also known as U. S. Highway 90, near a point on said Highway near the West abutment of the Blakely Bridge located in Baldwin County, Alabama, so at said time to collide with a vehicle being operated by the Plaintiff and as a proximate result of the Defendant's negligence as aforesaid, the Plaintiff received seven personal injuries in this, to-wit: Her right leg was cut and bruised, she was made sick and sore and lame; she was permanently injured; she was caused to expend considerable sums for medical treatment, nursing and medicines in and about the treatment of her injuries; her clothing and personal effects were damaged, for all of which she claims damages as aforesaid.


RICHARD C. LACEY
Attorney for Plaintiff

Serve Defendant by service on the Secretary of State, under Alabama's nonresident motorist statute, Title 7, Section 199. Defendant's address is 26 Linda Street, Pensacola Florida

FILED

DEC 30 1968

VOL

65 PAGE 170

CLERK

241-10-69

ORIGINAL

nr. 8483

De-shun Olson
George E. Olson

v.s.

Richard L. Berry

RECEIVED

JAN 9 1969

~~FILED~~

FILED

DEC 30 1968

AUGUST J. BECK CLERK
REGISTER

R. Lacey

1093
RECEIVED IN OFFICE
JAN 10 1969
M. S. BUTLER, Sheriff
(3)

Executed by serving 3 copies of
U.S. within on *Mable Amos*
Secretary of State of The State of
Alabama.

This the 10 day of Jan 1969

Sheriff of Montgomery County
M. S. Butler,

By W. L. Moore 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
process(es) or a total of \$2.50

W. L. Moore Deputy Sheriff

January 23, 1969

DEE THERESA OLSON

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

RICHARD L. BEERY

CASE NO. 8483

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Mabel Amos, Secretary of State, hereby certify that on January 10, 1969
I sent by certified mail in an envelope addressed as follows:

" Richard L. Beery
26 Linda Street
Pensacola, Florida 32506

"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:

" Richard L. Beery
26 Linda Street
Pensacola, Florida 32506

You will take notice that on January 10, 1969 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: DEE THERESA OLSON, Plaintiff VS RICHARD L. BEERY, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 8483 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 10
day of January 1969

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 January 21, 1969 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Pensacola, Fla.
on Not shown

WITNESS MY HAND and the Great Seal of the State of Alabama this the 23rd day
of January, 1969

Mabel Amos

Mabel Amos
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Honorable Richard C. Lacey
Fairhope, Alabama 36532

S U M M O N S

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE
STATE OF ALABAMA

You are hereby commanded to summon Richard L. Beery to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Dee Theresa Olson, Fairhope, Alabama.

WITNESS my hand this 31 day of Dec, 1968

Price L. Luck
CIRCUIT CLERK, BALDWIN COUNTY

DEE THERREAS OLSON,) IN THE CIRCUIT COURT OF BALDWIN
Plaintiff,) COUNTY, ALABAMA
VS.) AT LAW
RICHARD L. BEERY,) CASE NO. 8483
Defendant)

COUNTY ONE

90
7
2
7

The Plaintiff claims of the Defendant Ten Thousand Dollars (\$10,000.00), as damages, for heretofore and on, to-wit, the 5th day of January, 1968, the Defendant so negligently operated a motor vehicle on one of the public highways in the State of Alabama, to-wit, Battleship Parkway, also known as U. S. Highway 90, near a point on said Highway near the west abutment of the Blakely Bridge located in Baldwin County, Alabama, so at said time to collide with a vehicle being operated by the Plaintiff and as a proximate result of the Defendant's negligence as aforesaid, the Plaintiff received seven personal injuries in this, to-wit: Her right leg was cut and bruised, she was made sick and sore and lame; she was permanently injured; she was caused to expend considerable sums for medical treatment, nursing and medicines in and about the treatment of her injuries; her clothing and personal effects were damaged, for all of which she claims damages as aforesaid.

Richard C. Lacey
RICHARD C. LACEY
Attorney for Plaintiff

FILED Serve Defendant by service on the Secretary of State, under Alabama's nonresident motorist statute, Title 7, Section 199. Defendant's address is 26 Linda Street, Pensacola Florida

DEC 30 1968

CLERK
REGISTER

DEO 20 1968

FILED

and is address in Se Ring Street, Benecoles Florida
Dana's nonresident motorist statute, title 1, section 192. Defendant
serve defendant by service on the secretary of state, through the

Recorded for District
Richard C. Dwyer

damaged, for all of which the claimant damages as a result of

prescription for injuries, her clothing and personal effects were

for medical treatment, nursing and medicines in and about the

defendant's injuries, she was caused to expend considerable sums

and out and being, she was made sick and sore and lame, she was

received seven personal injuries, to-wit: her back, her

head, her left arm, her right arm, her left leg, her right leg

with a vehicle being operated by the defendant, the defendant

located in certain county, Florida, for the purpose of

being in the highway near the defendant's residence, the defendant

to-wit, defendant's property, situated in the county of

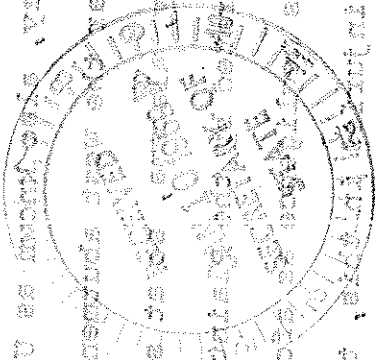
motor vehicle on one of the public highways in the state of Virginia,

year of January, 1968, the defendant so negligently operated a

(\$10,000.00), as damages, for heretofore and on, to-wit, the sum

See Thereas (Plaintiff)

Richard L. Berry



The Plaintiff claims of the Defendant her thousand dollars
COUNTY ONE

Defendant

RICHARD L. BERRY

CASE NO. 8483

vs.

AT LAW

Plaintiff

COUNTY, ALABAMA

DNA HERBERT OLSON

IN THE CIRCUIT COURT OF BALDWIN

CIRCUIT CLERK BALDWIN COUNTY
Richard L. Berry

Witness my hand this 8 day of June, 1968

Thereas Olson, Kentucky, Alabama.

holding the same, then and there to answer the complaint of Doe

the Circuit Court, to be held for said County at the place of

Robert William Smith (30) gave from the service of this writ in

the County of Baldwin, Alabama, to summon Richard L. Berry to

RECEIVED

JAN 9 1969

CLERK OF DISTRICT

S U M M O N S

STATE OF ALABAMA
TO ANY SHERIFF OF THE

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

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

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.

RETURN
TO

NAME OF SENDER

RECEIVED
JAN 21 1969
SECRETARY OF
STATE
MONTGOMERY ALABAMA

STREET AND NO. OR P.O. BOX

36104

POST OFFICE, STATE, AND ZIP CODE

POD Form 3811 Apr. 1967 655-10-716/8-10

DEE THERESA OLSON VS RICHARD L. BEERY (8483)

INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ 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.

1

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

2

INSURED NO.

DATE DELIVERED

SHOW WHERE DELIVERED (only if requested)

3

