

February 10, 1969

JAMES F. DAVIS, JR., Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

THOMAS E. KNIGHT, et al, Defendants

CASE NO. 8559

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

I, Mabel Amos, Secretary of State, hereby certify that on February 5, 1969
I sent by certified mail in an envelope addressed as follows:

" Thomas E. Knight
610 North Davis
Pensacola, Fla. 32501"

"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:

" Thomas E. Knight
610 North Davis
Pensacola, Fla. 32501

You will take notice that on February 5, 1969 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: JAMES F. DAVIS, JR., Plaintiff VS THOMAS E. KNIGHT, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 8559 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 5
day of February, 1969

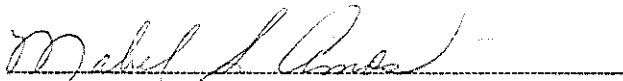
Enclosure (1)

(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 February 7, 1969 I received the return card, showing receipt by the designated addressee of the aforementioned matter at ~~not given~~ Pensacola, Fl. on February 6, 1969

WITNESS MY HAND and the Great Seal of the State of Alabama this the 10th day
of February, 1969



Mabel Amos
Secretary of State

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

CC: Honorable James Ray Owen
110 Court House Square
Bay Minette, Alabama 36507

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John W. West and Thomas E. Knight 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 the same, then and there to answer the complaint of James F. Davis, Jr.

WITNESS my hand this 4th day of February, 1969.

Alice J. Duck
Clerk

The address of John W. West is 914 Twinbrook Avenue, Pensacola, Florida.

The address of Thomas E. Knight is 610 North Davis, Pensacola, Florida.

* * * * *


JAMES F. DAVIS, JR.,
Plaintiff,
VS.
JOHN W. WEST and
THOMAS E. KNIGHT,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
8559

C O M P L A I N T
COUNT ONE

Plaintiff claims of the defendants Seven Hundred Seventy-five Dollars (\$775.00) for that heretofore on to-wit, November 24, 1968, at a point on Highway 90 in Loxley, Baldwin County, Alabama, where the said highway intersects Relham Drive, while the plaintiff was driving his automobile on said Highway 90 at a point where he had a right to be, the defendant, John W. West, who was then and there an agent, servant or employee of the defendant, Thomas E. Knight, acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle so as to cause it to run into, upon or against the automobile of plaintiff and as a proximate result of the negligence of the said defendant, John W. West, at said time and place, the plaintiff's

automobile was bent, broken and damaged, all to his damages afore-
said, hence this suit. Plaintiff avers that all of his injuries
and damages were the proximate result of the negligence of the
defendant, John W. West, who was at said time and place an agent,
servant or employee of the defendant, Thomas E. Knight, acting
within the line and scope of his authority as such agent, servant
or employee.



Attorney for Plaintiff

FILED

FEB 4 1969

ALICE J. DUCK CLERK
REGISTER



MABEL AMOS
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY, ALABAMA 36104
February 10, 1969

Honorable James Ray Owen
110 Court House Square
Bay Minette, Alabama 36507

Dear Mr. Owen:

Re: JAMES F. DAVIS, JR., Plaintiff VS JOHN W. WEST, et al,
Defendants

Please refer to your file in the above-styled cause and be advised that on February 5, 1969, I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

John W. West
914 Twinbrook Ave.
Pensacola, Fla. 32505

On February 7, 1969, this letter (Certified No. 53922) was returned to me with reason for non-delivery given as "MOVED, LEFT NO ADDRESS".

Will you please advise me as to any further efforts you wish me to make in perfecting this service.


Yours very truly,

Mabel S. Amos
Secretary of State

fc

CC: Honorable Alice J. Duck, Clerk
✓ Circuit Court of Baldwin County
Bay Minette, Alabama 36507

automobile was bent, broken and damaged, all to his damages afore-said, hence this suit. Plaintiff avers that all of his injuries and damages were the proximate result of the negligence of the defendant, John W. West, who was at said time and place an agent, servant or employee of the defendant, Thomas E. Knight, acting within the line and scope of his authority as such agent, servant or employee.


Attorney for Plaintiff

FILED

FEB 4 1969

ALICE J. DUCK CLERK
REGISTER

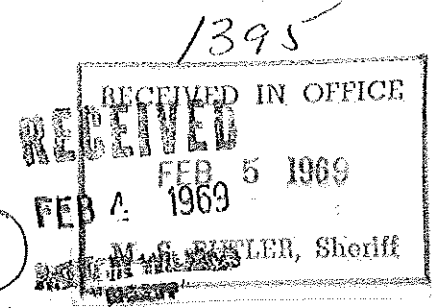
8559

James T. Davis, Jr.
Pltz

vs.

John W. West &
Thomas E. Knight

James R. Owen



Executed by serving 6 copies of
the within on Mable Amos
Secretary of State of The State of
Alabama.
[FILED] On 5 day of Feb. 19 69

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 3.00 process(es) and \$1.00
travel expense on each of 2.00
process(es) or a total of 15.00

W. L. Mason Deputy Sheriff