

OWENS & PATTON
ATTORNEYS AT LAW

J. CONNOR OWENS, JR.
DAHLBERG BUILDING
P. O. BOX 729
BAY MINETTE, ALABAMA 36507
TELEPHONE NO. 937-4661
AREA CODE 205

April 8, 1969

WALTER S. PATTON, III
302 DE LA MARE STREET
FAIRHOPE, ALABAMA 36532
TELEPHONE NO. 928-9881
AREA CODE 205

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

Subject: Elizabeth Jane Burns vs. Thomas T.
Tunstall
Case No. 8593


Dear Mrs. Duck:

This is with reference to a summons and complaint filed by this office in the above styled matter, which was returned to you by the Sheriff's office marked "not found".

I discussed the matter later with Mr. Roy Randall and he informed me that Mr. Tunstall had told him that he would come by his office and pick up the summons and complaint and I would appreciate it very much if you would please return these papers to the Sheriff's office.

Thank you for your aid and consideration in this matter.

Sincerely yours,


J. Connor Owens, Jr.

JCO:am

CC: Hon. Taylor Wilkins
Sheriff of Baldwin County
Bay Minette, Alabama.

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8573

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon THOMAS T. TUNSTALL, IV.

ROUTE I

DAPHNE, ALABAMA

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.....

THOMAS T. TUNSTALL, IV.

Defendant.....

by ELIZABETH JANE BURNS

Plaintiff.....

Witness my hand this 12th day of February 19 69

Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

ELIZABETH JANE BURNS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
THOMAS T. TUNSTALL, IV.,)	
Defendant.)	AT LAW.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND DOLLARS (\$1,000.00) damages, for that heretofore, on to-wit, October 5, 1968, the Plaintiff was operating her automobile on U. S. Highway No. 98, at a point thereon at the intersection of said highway and College Avenue in Daphne, Alabama, which said highway at said point is a public road in Baldwin County, Alabama, and at said time and at said place the said Defendant so negligently operated his automobile so as to cause or allow the same to run into, upon or against the automobile which the Plaintiff was then and there operating and as a proximate consequence thereof, the Plaintiff was damaged in this: She suffered multiple lacerations of her forehead, face, nose and eyebrows, was caused to be hospitalized and incurred medical expense; her automobile was completely demolished and rendered unfit for further use, all to the damage of the Plaintiff; hence this suit.

OWENS AND PATTON

By: *James Owens, Jr.*
Attorneys for Plaintiff.

FILED
FEB 13 1969
ALICE J. DECK
CLERK
REGISTER

ELIZABETH JANE BURNS,)
Plaintiff,)
vs.)
THOMAS T. TUNSTALL, IV.,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.
700,8573

The Plaintiff claims of the Defendant the sum of ONE THOUSAND DOLLARS (\$1,000.00) damages, for that heretofore, on to-wit, October 5, 1968, the Plaintiff was operating her automobile on U. S. Highway No. 98, at a point thereon at the intersection of said highway and College Avenue in Daphne, Alabama, which said highway at said point is a public road in Baldwin County, Alabama, and at said time and at said place the said Defendant so negligently operated his automobile so as to cause or allow the same to run into, upon or against the automobile which the Plaintiff was then and there operating and as a proximate consequence thereof, the Plaintiff was damaged in this: She suffered multiple lacerations of her forehead, face, nose and eyebrows, was caused to be hospitalized and incurred medical expense; her automobile was completely demolished and rendered unfit for further use, all to the damage of the Plaintiff; hence this suit.

OWENS AND PATTON

By: *James Owens, Jr.*

Attorneys for Plaintiff.

FILED

FEB 13 1969

ALICE J. BUCK

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon THOMAS T. TUNSTALL, IV.

ROUTE I

DAPHNE, ALABAMA

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.....

THOMAS T. TUNSTALL, IV. Defendant.....

by ELIZABETH JANE BURNS.....

..... Plaintiff.....

Witness my hand this..... 12th day of..... February..... 19. 69

..... *Rebecca D. Smith*, Clerk

No. 8573

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ELIZABETH JANE BURNS

Plaintiffs

vs.

THOMAS T. TUNSTALL, IV.,

Defendants

SUMMONS AND COMPLAINT

Filed February 12, 1969 19.....

Price J. Davis Clerk

J. CONNOR OWENS, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1

Daphne, Alabama.....

Received In Office

2/13 1969

Taylor Wilkins Sheriff
I have executed this summons

this 19.....

by leaving a copy with

Thomas T. Tunstall IV
Home in Service
at Bohle Island

Randall

Returned *19* day of *Feb* 1969
Not found in my county after diligent search and inquiry
Thomas Tunstall IV

Taylor Wilkins, Sheriff

By

Randall
Deputy Sheriff

Sheriff

Deputy Sheriff