

JOHN E. COLEMAN,	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs.	)	
BEAR POINT MARINA, INC.,	)	BALDWIN COUNTY, ALABAMA
a Corporation, and THUNDERHAWK,	)	
LTD., INC., a corporation,	)	AT LAW.
Defendants.	)	

The Plaintiff claims of the Defendants the sum of THREE THOUSAND DOLLARS (\$3,000.00) as damages for conversion by them on November 2, 1968, of the following described chattels:

One (1) 1968 14 foot Thunderhawk Boat, Serial #14733;  
 One (1) 1968 Mercury 50 H.P. Motor, Serial #2344371;  
 One (1) Boat Trailer,

the property of the Plaintiff.

OWENS AND PATTON

By:

*[Handwritten Signature]*  
 Attorneys for Plaintiff.

FILED

FEB 13 1969

ALICE C. BROWN CLERK  
 REGISTER

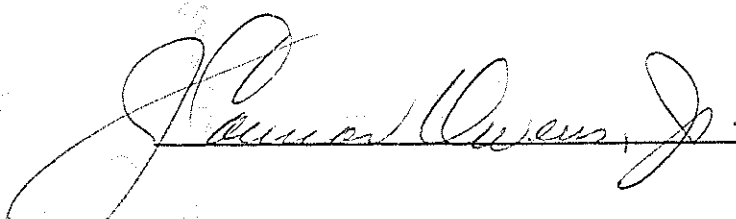
JOHN E. COLEMAN,	)		
Plaintiff,	)	IN THE CIRCUIT COURT OF	
vs.	)	BALDWIN COUNTY, ALABAMA	
BEAR POINT MARINA, INC., a	)		
corporation, and THUNDERHAWK,	)	AT LAW.	NO. 8574
LTD., INC., a corporation,	)		
Defendants.	)		

AFFIDAVIT

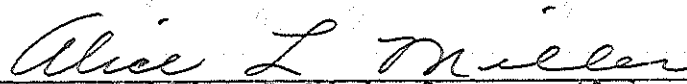
STATE OF ALABAMA     )  
                                   (  
 BALDWIN COUNTY        )

Before me, the undersigned authority, within and for said State and County, personally appeared J. Connor Owens, Jr., who first being duly sworn, deposes and says under oath as follows:

That he is the attorney of record for the Plaintiff in the above styled cause filed in the Circuit Court of Baldwin County, Alabama; that the Defendant, THUNDERHAWK, LTD., INC., is a non-resident corporation of the State of Alabama, being a Georgia Corporation, and having its principal place of business in Dawson, Georgia; that it will be necessary to obtain service on said corporation through the office of the Secretary of State of Alabama, under the provisions of Title 7, Section 199(1) of the Code of Alabama.

  
 \_\_\_\_\_

Sworn to and subscribed before  
 me on this the 12th day of  
 February, 1969.

  
 \_\_\_\_\_  
 Notary Public, Baldwin County, Alabama.

Received 13 day of Feb 19 69

Affid on 17 day of Feb 19 69

I served a copy of the within A & C

on Deer Point Marine,  
Inc.

By service on Mr. Jackson

TAYLOR WILKINS, Sheriff

By Chadwick S.

Orange Beach 120 mi.

Sheriff claims 120 miles at

Ten Cents per mile Total \$ 12.00

TAYLOR WILKINS, Sheriff

BY Chadwick  
DEPUTY SHERIFF

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 BEAR POINT MARINA, INC., a corporation  
ORANGE BEACH, ALABAMA  
and  
THUNDERHAWK, LTD., INC., a corporation  
DAWSON, GEORGIA

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 Bear Point  
Marina, Inc., and Thunderhawk, Ltd., Inc.  
Defendant.....

by JOHN E. COLEMAN

Plaintiff.....

Witness my hand this 21th day of February, 1962..

*Becky French* Clerk

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2-24-69

No. 8574

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JOHN E. COLEMAN

Plaintiffs

vs.

BEAR POINT MARINA, INC., ET AL.,

Defendants

SUMMONS AND COMPLAINT

Filed FEBRUARY 12, 1969 19.....

Clerk

OWENS AND PATTON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

RECEIVED

FEB 15 1969 Sheriff

M. S. BUTLER

Sheriff

I have executed this summons

this ..... 19.....

by leaving a copy with

Executed by serving 3 copies of  
the within on Mattie Ann  
Secretary of State of The State of  
Alabama

This the 24 day of Feb. 1969

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 1 process(es) and \$1.00

travel expense on each or Sheriff  
process(es) or a total \$2.50  
Deputy Sheriff

W. L. Mason Deputy Sheriff

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February 27, 1969

JOHN E. COLEMAN, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA AT LAW

VS.

THUNDERHAWK, LTD., INC., et al, Defendants

CASE NO. 8574

STATE OF ALABAMA  
MONTGOMERY COUNTY

Before me, Sara F. Blackerby, a Notary Public in and for said State-at-Large, personally appeared Mabel Amos, Secretary of State of the State of Alabama, who is known to me and who, being duly sworn, deposes and says that in her official capacity as Secretary of State of the State of Alabama she, on the 24th day of February, 1969 sent by certified mail in an envelope addressed as follows:

"Thunderhawk, Ltd., Inc.  
Dawson, Georgia 31742"

"Certified Mail—  
Return Receipt Requested  
~~XXXXXXXXXXXXXXXXXXXX~~"

bearing sufficient and proper prepaid postage, a notice bearing her signature and the Great Seal of the State of Alabama in words and figures as follows:

"Thunderhawk, Ltd., Inc.  
Dawson, Georgia 31742

You will take notice that on February 24, 1969 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, Summons and Complaint and Affidavit in a case entitled: JOHN E. COLEMAN, Plaintiff VS THUNDERHAWK, LTD., INC., et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

Case No. 8574

a true copy of which Summons and Complaint and Affidavit are 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, said service being under provisions of Title 7, Section 199(1) of the 1940 Code of Alabama and Supplement thereto.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 24th day of February, 1969

(Signed) Mabel S Amos

Mabel S Amos

Secretary of State "

Enclosures (2)

Affiant further says 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 and Affidavit in the above-styled cause.

Affiant further says that on February 27, 1969 she received the "Return Card" showing receipt by the designated addressee of the aforementioned matter at Dawson, Ga. on February 26, 1969

*Mabel S Amos*

Affiant—Mabel S Amos

Secretary of State

Sworn to and subscribed before me, this the 27th day of February, 1969

*Sara F. Blackerby*  
Notary Public—State-at-Large

My Commission expires: 1-17-71

Enclosures—"Return Receipt" and  
Copy of Process

CC: Honorable J. Connor Owens, Jr.  
Owens & Patton  
Dahlberg Building  
Bay Minette, Alabama 36507

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

**STATE OF ALABAMA**  
**Baldwin County**

Circuit Court, Baldwin County

No. 8574

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BEAR POINT MARINA, INC., a corporation  
ORANGE BEACH, ALABAMA  
and  
THUNDERHAWK, LTD., INC., a corporation  
DAWSON, GEORGIA

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 Bear Point  
Marina, Inc., and Thunderhawk, Ltd., Inc.

..... Defendant.....

by JOHN E. COLEMAN

..... Plaintiff.....

Witness my hand this 23<sup>rd</sup> day of February 1959

W. J. French, 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

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Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
BEAR POINT MARINA, INC.,	)	
a Corporation, and THUNDERHAWK,	)	
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OWENS AND PATTON

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

FILED

FEB 13 1969

WILLIAM E. BERRY CLERK  
 JAMES O. BERRY REGISTER

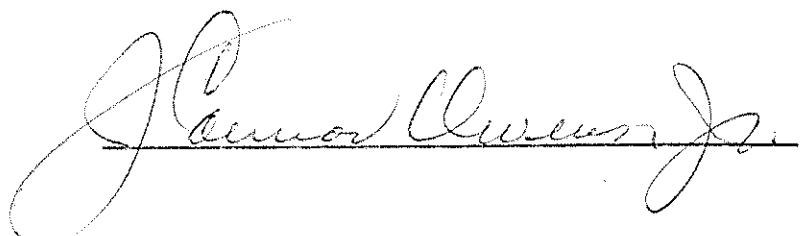
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 Notary Public, Baldwin County, Alabama.