

KENNETH COOPER
ATTORNEY AT LAW
109 EAST 1ST STREET
BAY MINETTE, ALABAMA 36507
TELEPHONE 937-7412
11 August, 1969

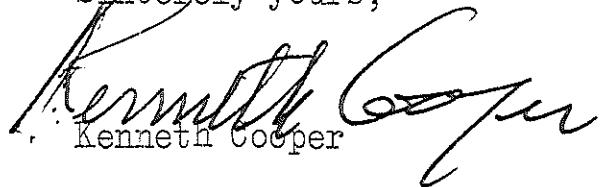
Mrs. Alice J. Duck
Clerk, Circuit Court
Bay Minette, Alabama

Re: Hall vs Reil, Case No.
8780, At Law.

Dear Mrs. Duck:

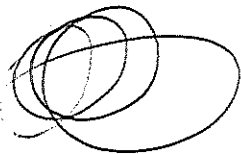
Please note my withdrawal from above-styled cause,
effective this date. This case will now be handled by Hon.
Sydney R. Prince, III, of Mobile, Alabama.

Sincerely yours,


Kenneth Cooper

KC/lb

cc: Hon. Sydney R. Prince, III
Mrs. Bertha L. Reil



J. CONNOR OWENS, JR.

ATTORNEY AT LAW

DAHLBERG BUILDING

P. O. BOX 729

BAY MINETTE, ALABAMA 36507

November 2, 1970

TELEPHONE NO. 937-4661

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

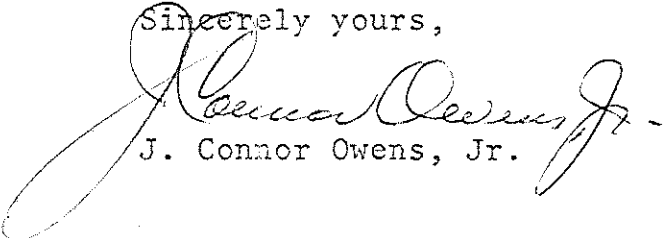
Subject: Leslie D. Hall vs. Bertha Riel
Case No. 8780

Dear Mrs. Duck:

The above styled case has been settled between the parties and I would appreciate it very much if you would please cause the same to be dismissed and upon preparation of the cost bill in the matter, please forward the same to Mr. Sydney R. Prince, III, the attorney for the defendant.

Thank you for your consideration in this matter.

Sincerely yours,


J. Connor Owens, Jr.

JCO:am

CC: Mr. Sydney R. Prince, III
Attorney at Law
P. O. Box 1109
Mobile, Alabama 36601

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

FRANCIS H. INGE (1902-1959)
THOS. E. TWITTY
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III
JOHN N. LEACH, JR.

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

36602

MAILING ADDRESS:

P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:

TWINING
TELEPHONE
433-5441

October 26, 1970

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

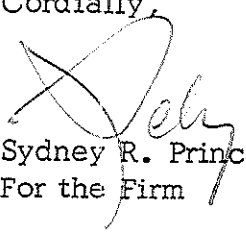
Re: Leslie D. Hall v. Bertha Riel
Case No. 8780

Dear Mrs. Duck:

The above case is to be dismissed on motion of the plaintiff with costs assessed against the defendant. I would appreciate receiving a certificate from you showing that this case has been dismissed and that costs have been taxed against the defendant and I will attend to the payment of those costs promptly.

Your usual cooperation is appreciated.

Cordially,


Sydney R. Prince, III
For the Firm

SRP, III:tt

INGE, TWITTY, DUFFY & PRINCE

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FRANCIS H. INGE (1902-1959)
THOS. E. TWITTY
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III
JOHN N. LEACH, JR.

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36601

CABLE ADDRESS:

TWINING
TELEPHONE
433-5441

November 7, 1969

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

Re: Leslie D. Hall vs. Bertha L. Riel
Case No. 8780, Baldwin County
Joe Rowe Bennett vs. Bertha L. Riel
Case No. 8836, Baldwin County

Dear Mrs. Duck:

Please issue subpoenas to the following named individuals directing them to appear at the offices of Messrs. Inge, Twitty, Duffy & Prince, 13th Floor, Merchants National Bank Building, Mobile, Alabama, on November 10, 1969, for the taking of their pretrial depositions in the above referenced matters:

Leslie D. Hall
c/o Hammel's Department Store
7 South Royal Street
Mobile, Alabama 36602

Joe Rowe Bennett
c/o Hammel's Department Store
7 South Royal Street
Mobile, Alabama 36602

Mr. Hall's testimony is to be taken at 8:00 a.m. and Mr. Bennett's at 8:30 a.m.

Thank you for your cooperation in this matter.

Cordially,


Sydney R. Prince, III

SRP, III:tt
Enclosures

gone

LESLIE DEE HALL,) IN THE CIRCUIT COURT OF
 Plaintiff) BALDWIN COUNTY, ALABAMA
 vs.) AT LAW
 BERTHA L. RIEL,)
 Defendant.) CASE NO. 8780

NOTICE OF DEPOSITION

TO: Mr. Robert E. Hodnette, Jr.
 Holberg, Tully & Hodnette
 Milner Building
 Mobile, Alabama

Mr. J. Connor Owens, Jr.
 P. O. Box 729
 Bay Minette, Alabama 36507

You are hereby notified that defendant Bertha L. Riel, will take the pretrial discovery deposition of Dr. L. E. Rockwell on Tuesday, November 18, 1969, at 4:00 p.m. in the office of Dr. Rockwell located on Main Street in Daphne, Alabama, before Charles A. Howard, or before some other officer authorized by law to take depositions. The deposition is to be taken in accordance with and pursuant to Act No. 375 of the Alabama Legislature of 1955, as amended, and will continue from day to day until the completion of same. You are invited to attend and examine the deponent.

Dated this 10th day of November, 1969.

INGE, TWITTY, DUFFY & PRINCE

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 10th day of Nov., 1969.

John N. Leach, Jr.
 Attorney for

By John N. Leach, Jr.
 John N. Leach, Jr.

FILED

NOV 12 1969

LESLIE DEE HALL,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
BERTHA L. RIEL,)
Defendant.) CASE NO. 8780

NOTICE OF DEPOSITION

TO: Mr. Robert E. Hodnette, Jr.
Holberg, Tully & Hodnette
Milner Building
Mobile, Alabama

Mr. J. Connor Owens, Jr.
P. O. Box 729
Bay Minette, Alabama 36507

You are hereby notified that defendant Bertha L. Riel will take the pretrial discovery deposition of Dr. L. L. Brown, on Monday, November 17, 1969, at 3:00 p.m. at the office of Dr. Brown located at 58 North Broad Street, Mobile, Alabama, before Charles A. Howard, or before some other officer authorized by law to take depositions. The deposition is to be taken in accordance with and pursuant to Act No. 375 of the Alabama Legislature of 1955, as amended, and will continue from day to day until the completion of same. You are invited to attend and examine the deponent.

Dated this 10th day of November, 1969.

INGE, TWITTY, DUFFY & PRINCE

By

John N. Leach, Jr.
John N. Leach, Jr.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 11th day of Nov, 1969.

John N. Leach, Jr.
Attorney for

FILED

NOV 12 1969

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ALICE J. DUCK
CLERK
REGISTER

LESLIE DEE HALL,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
BERTHA L. RIEL,)
Defendant.) CASE NO. 8780

NOTICE OF DEPOSITION

TO: Mr. Robert E. Hodnette, Jr.
Holberg, Tully & Hodnette
Milner Building
Mobile, Alabama

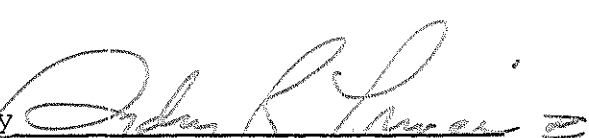
Mr. J. Connor Owens, Jr.
P. O. Box 729
Bay Minette, Alabama 36507

You are hereby notified that defendant Bertha L. Riel, will take the pretrial discovery deposition of Leslie D. Hall, on Monday, November 10, 1969, commencing at 8:00 a.m. in the offices of Messrs. Inge, Twitty, Duffy & Prince, located on the 13th Floor of the Merchants National Bank Building, Mobile, Alabama, before Louis M. Hubbard, Jr., or before some other officer authorized by law to take depositions. The deposition is to be taken in accordance with and pursuant to Act No. 375 of the Alabama Legislature of 1955, as amended, and will continue from day to day until the completion of same. You are invited to attend and examine the deponent.

Dated this 7th day of November, 1969.

INGE, TWITTY, DUFFY & PRINCE

By


Sydney R. Prince, III

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 2nd day of Nov, 1969.


Attorney for

FILED

NOV 8 1969

ALICE J. DUCK CLERK
REGISTER


LESLIE DEE HALL,) IN THE CIRCUIT COURT OF
 Plaintiff,) BALDWIN COUNTY, ALABAMA
 VS.) AT LAW
 BERTHA L. RIEL,)
 Defendant.) CASE NO. 8780

ANSWER

Comes now the defendant in the above styled cause, and for answer to the plaintiff's complaint, and each count thereof, separately and severally, files the following separate and several pleas:

1. Not guilty.
2. The defendant denies the material allegations of the plaintiff's complaint.

INGE, TWITTY, DUFFY & PRINCE

By 
 Sydney R. Prince, III

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this _____ day of _____, 19____.

 Attorney for

FILED

AUG 12 1969

ALICE J. BECK CLERK
 REGISTER

LESLIE DEE HALL,)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
BERTHA L. RIEL,)	
Defendant.)	IN LAW.

8780

The Plaintiff, Leslie Dee Hall, claims of the Defendant, the sum of FIFTY THOUSAND AND NO/100 DOLLARS (\$50,000.00) damages for that heretofore, on, to-wit, September 3, 1968, the Defendant, Bertha L. Riel, so negligently operated a motor vehicle on U. S. Highway Number 98, a public road in Baldwin County, Alabama, at a point approximately 1.2 miles West of the Montrose Post Office, as to cause or allow the same to run into, upon and against a motor vehicle which the Plaintiff was then and there operating and as a proximate consequence of the negligence of the Defendant, Bertha L. Riel, the Plaintiff was seriously and permanently injured in this: several vertebrae in his spine were cracked; he received cuts and abrasions on his head, arms and hands; he was caused to be hospitalized and to receive surgery upon the fifth vertebrae in his neck; he was caused to incur medical and drug bills; he was caused to lose two months work and was caused pain and suffering; wherefore, he brings this suit and asks judgment in the above amount.

HOLBERG, TULLY AND HODNETTE
and
J. CONNOR OWENS, JR.

By: *J. Connor Owens, Jr.*
Attorneys for Plaintiff.

Plaintiff demands a trial of this
cause by a Jury.

J. Connor Owens, Jr.

FILED

JUL 1 1969

ALICE J. DUEK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 8780

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BERTHA L. RIEL

..... 480 DOGWOOD AVENUE

..... FAIRHOPE, 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.....

BERTHA L. RIEL

..... Defendant.....

by LESLIE DEE HALL

.....

..... Plaintiff.....

Witness my hand this..... 1st..... day of..... JULY..... 19 69

..... Alice J. Mueka Clerk

EL- 7-11-69

SVOL

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LESLIE DEE HALL

Plaintiffs

vs.

BERTHA L. RIEL

Defendants

SUMMONS AND COMPLAINT

Filed JULY 1 1969

Clerk

ALICE J. DUCK
CLERK
REGISTER

Holberg, Tully and Hodnette
and
J. Connor Owens, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
480 Dogwood Avenue
Fairhope, Alabama

Received In Office
RECEIVED

JUL 2 1969

~~RECEIVED~~ Sheriff

I have executed this summons

this 7-11 1969

by leaving a copy with

Bertha L. Riel

Sheriff claims 7.0 miles at

Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff

BY *Randall*
DEPUTY SHERIFF

Sheriff

R. Randall Deputy Sheriff

F. Hope

