

JOHNSON MOTOR LINES, INC.,

Plaintiff,

VS.

JAMES H. SHAW,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6817

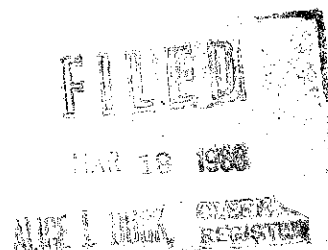
ANSWER

Now comes the defendant and for answer to the complaint heretofore filed in this cause, says: Not guilty.

J. B. Blachum
Attorney for Defendant

Defendant demands a trial of said cause by jury.

J. B. Blachum
Attorney for Defendant



STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James H. Shaw 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 same, then and there to answer the Complaint of Johnson Motor Lines, Inc.

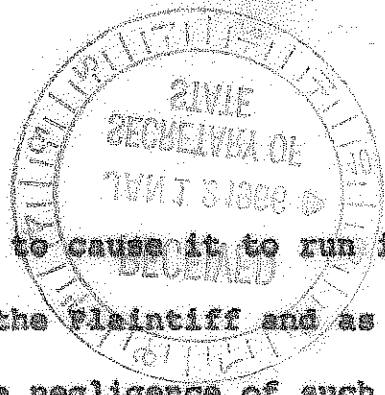
Witness my hand this 10 day of January, 1966.

Richard J. Wick
Clark

JOHNSON MOTOR LINES, INC.,	I	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
JAMES H. SHAW,	X	LAW SIDE
Defendant.	X	W. 6817

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Two Thousand Dollars (\$2,000.00) as damages for that, heretofore on, to-wit, February 6, 1965, the Plaintiff was the owner of a 1961 International 2 1/2 Ton Tractor and Trailer which was being driven by an agent, servant or employee of said corporation on U. S. Highway 90, a public highway in Baldwin County, Alabama, at a point approximately 5.4 miles West of the Town of Loxley, Alabama, and at said time and place the Defendant so negligently operated



a motor vehicle that he was driving as to cause it to run into or against the motor vehicle owned by the Plaintiff and as a direct and proximate consequence of the negligence of such Defendant the Plaintiff was damaged in this: Its cab was bent and damaged, the door glass was broken, its fuel tanks were damaged, its left front fender was damaged, its front bumper was bent, its front lights were damaged and its frame was bent, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

JOHNSON MOTOR LINES, INC.,
Bisbee,

Defendant
JAMES H. SHAW
vs.

COMMONS AND COMPLAINANT

Shaw, Stone & Chason
Attorneys for Plaintiff

CERTIFICATE

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared John Chason, the Attorney of Record for the Plaintiff in the above styled cause and after being by me first duly and legally sworn did depose and say under oath as follows:

My name is John Chason and I am the Attorney of Record for the Plaintiff in the above cause. According to the best of my knowledge, information or belief the Defendant, James H. Shaw, is a non-resident of the State of Alabama, his address being Badge No. 927775, Department 9, Ingalls Shipbuilding Corporation, Pascagoula, Mississippi, and said Defendant is over the age of twenty-one years.

John Chason

Sworn to and subscribed before me this
the 10th day of January, 1966.

Marie B. Bryars
Notary Public, Baldwin County, Alabama

66-1-12-66
on Rec. of State

FILED
JAN 10 1966
MADE L. DICK, CLERK
REGISTER

SHERIFF



M. S. BUTLER

MONTGOMERY COUNTY

MONTGOMERY 2, ALA.

P. O. DRAWER 4219

MEMBER ALABAMA SHERIFF'S ASSOCIATION

RICHARD GOODWYN
CHIEF DEPUTY SHERIFF
OFFICE PHONE 265-9363

May 31, 1966

W. J. WILLIAMS
CHIEF JAIL WARDEN
JAIL PHONE 263-2555

Hon. Taylor Wilkins, Sheriff
Baldwin County
Bay Minette, Ala.

Dear Hon. Wilkins:

This paper was served January 12, 1966 by serving three copies on the Secretary of State and was returned to your office on that same day.

It may be possible that it was lost in the mail.

If we can be of any further help to you in anyway, please call on us to do so.

Sincerely Yours,

M. S. Butler, Sheriff

By: *Ben Panther, Clerk*



STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY, ALABAMA 36104

MRS. AGNES BAGGETT
SECRETARY OF STATE

February 3, 1966

Hon. John Chason
Bay Minette,
Alabama

Dear Mr. Chason:

Re: Johnson Motor Lines, Inc.
VS James H. Shaw

Please refer to your file in the above-styled cause and be advised that on January 12, I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

James H. Shaw
Badge No. 927775
Department 9

Ingalls Shipbuilding Corporation, Pascagoula, Miss.

On February 3, this letter (Certified No. 56082) was returned to me with reason for non-delivery given as "UNCLAIMED."

If you would like to further pursue service on this defendant, according to the provisions of Title 7, Section 199, an additional \$2 deposit will enable me to attempt personal service by local law enforcement officers.

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

Yours sincerely,

Mrs. Agnes Baggett
Secretary of State

as

cc: Hon. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Ala.

FILED

FEB 7 1966

ALICE J. DUCK, CLERK
REGISTER

FILED

FEB 8 1966

ALICE J. DUCK, CLERK
REGISTER



STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY 4, ALABAMA

January 12, 1966

MRS. AGNES BAGGETT
SECRETARY OF STATE

James H. Shaw
Badge No. 927775
Department 9
Ingalls Shipbuilding Corporation
Pascagoula, Miss.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
DELIVER TO ADDRESSEE ONLY

You will take notice that on January 12, 1966 the Sheriff of
Montgomery County, Alabama, served upon me, in my official capacity, Summons and Com-
plaint in a case entitled: JOHNSON MOTOR LINES, INC.,

Plaintiff VS JAMES H. SHAW,

Defendant in the CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA LAW SIDE

Case No. 6817 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 12
day of January 1966.

Mrs. Agnes Baggett
Mrs. Agnes Baggett
Secretary of State

Enclosure : Copy of Summons and Complaint
cc: Hon. John Chason
Bay Minette, Ala.