

1192

June 24, 1948

Hon. James E. Duggan
Attorney At Law
Bay Minette, Alabama

Re: Allie L. Moog vs Natale Cellini

Dear Sir:

Please refer to your file on the above-styled case
and be advised as follows:

One June 8, 1948 I sent via registered mail, return
receipt requested, deliver to addressee only, my notice to-
gether with copy of summons and complaint in this case to
said defendant:

Miss Natale Cellini
64 Vinton Street
Providence, Rhode Island.

On June 23, 1948 this letter was returned to me with
reason for non-delivery stamped thereon; "UNCLAIMED."

If you can furnish another or more accurate address
I shall be glad to further my efforts to effect service.

Sincerely yours,

Sibyl Pool
Sibyl Pool
Secretary of State

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

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1192

TERM, 194

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon Natale Cellini

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

Natale Cellini

, Defendant

by

Allie L. Moog

, Plaintiff

Witness my hand this 28th day of May 1948

Chief Clerk

, Clerk.

ALLIE L. MOOG,
Plaintiff,

-VS-

NATALE CELLINI,
Defendant,

IN THE
CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

At Law
#

COUNT 1.

Plaintiff claims of Defendant the sum of Five Thousand and NO/100 (\$5000.00) Dollars as damages for that on, to-wit, March 21st, 1948, Plaintiff was riding in an automobile on a public highway in Baldwin County, Alabama, viz: United States Highway 90, and known as Old Spanish Trail, at a point approximately 1058 feet East of Blackwater Creek, and then and there an automobile which was being driven by Defendant ran upon, over or against said automobile in which Plaintiff was riding, as aforesaid, causing great damage and injuries to Plaintiff, to-wit, throwing Plaintiff violently against the windshield of the automobile in which she was riding, as aforesaid, and rendering her unconscious; causing severe shock and aggravating a heart condition from which she was then suffering; severely and painfully injuring one leg and knee, and causing bruises and contusions over her face and body, for all of which she was compelled to obtain medical care and to have x-ray pictures made. And Plaintiff avers that she still suffers from said injuries and is stiff and sore and remains partially incapacitated as a proximate result thereof. And Plaintiff avers that all of said damages to her person were proximately caused by the negligence of Defendant in that he negligently caused, allowed or permitted said automobile which he was then and there operating, as aforesaid, to run upon, over or against the automobile in which Plaintiff was riding, as aforesaid, and as a proximate consequence thereof Plaintiff was damaged and injured, as aforesaid.

And Plaintiff avers that Defendant is, and was at the time of said collision, to-wit, March 21st., 1948, a non-resident of the

State of Alabama, and that the present Post-office address of said Defendant is #64 Vinton Street, Providence, Rhode Island; and Plaintiff prays that service of process upon Defendant may be had in accordance with the provisions of Code of 1940, Title 7, Paragraph 199.



ATTORNEY FOR PLAINTIFF

Plaintiff demands a Jury Trial



ATTORNEY FOR PLAINTIFF

623

RECEIVED IN OFFICE
JUN 7 - 1948
G. A. WATLEY, Sheriff

Received in Sheriff's Office
this 28 day of May, 1948
TAYLOR WILKINS, Sheriff

EXECUTED BY DELIVERING
3 copies of the within
to *Lybil Roale*
Secretary of State
OF THE *State of Ala*
AND SAID *Lybil Roale*
WAS MUCH WHEN SO SERVED
G. A. Watley
County Montgomery, Ala
Samuel E. Ebdugan
Deputy Sheriff

192

NO 11 92 RECORDED

Filed
5-28-48
Alice J. Duck
clerk