



SIBYL POOL
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE

MONTGOMERY 4, ALABAMA

September 13, 1948

1224

Hon. C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

Re: W. F. McClammy, Plaintiff

VS

I.J. Ingram & Louis Thomas Melton

Dear Sir:

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

On August 25, 1948 I sent by registered mail, return receipt requested, Deliver to Addressee only, my notice together with copy of summons and complaint in this case to the said defendant, Louis Thomas Melton, General Delivery, Paris, Texas.

On September 13, 1948 this registered letter was returned to me with reason for non-delivery stamped thereon by postal authorities as "Unclaimed."

I shall be glad to continue my efforts in this case upon your further instructions.

Sincerely yours,

Sibyl Pool
Secretary of State

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

Rev. H. H. H. H. H.
 Rev. H. H. H. H. H.
 Clerk, Circuit Court
 Co. H. H. H. H. H.

Secretary of State
 2101 1001
[Signature]
 H. H. H. H. H.

Your further instructions.

I shall be glad to comply with your request in this case.

On September 13, 1948, this registered letter was delivered to the wife of the above-named person.

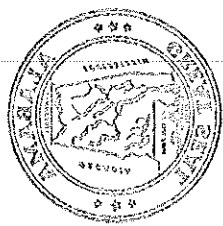
On August 31, 1948, I sent a registered letter to the wife of the above-named person.

Dear Sir:
 I am in receipt of your letter of the 13th inst. regarding the above-named person.

Very respectfully,
 H. H. H. H. H.

FILED
 SEP 15 1948

ALICE J. DUCK, Register



SECRETARY OF STATE
 STATE OF ALABAMA

September 13, 1948

MONTGOMERY, ALABAMA

OFFICE OF SECRETARY OF STATE
 STATE OF ALABAMA

1948

STATE OF ALABAMA
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon I.J. Ingram and Louis Thomas Melton 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 W.F. McClammy.

Witness my hand, this 19 day of August, 1948.

Archie J. Leach
Clerk

W.F. McCLAMMY
Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS

I.J. INGRAM AND
LOUIS THOMAS MELTON
Defendants

AT LAW

Count 1. Plaintiff claims of the defendants the sum of One Hundred and Sixty Eight Dollars and Thirty Five Cents (\$168.35), in that heretofore and on, to-wit, June 2, 1948, the plaintiff was driving his automobile, upon and along a public highway, to-wit, U.S. Highway 31, about, to-wit, Twenty Two miles from the Court House in Bay Minette, Alabama, and the plaintiff further avers that he was on the right side of the highway as required by law and while so driving his automobile the defendant's employee did negligently and carelessly run the defendant's automobile truck into the plaintiff's automobile and damaged plaintiff's automobile in the aforesaid sum.

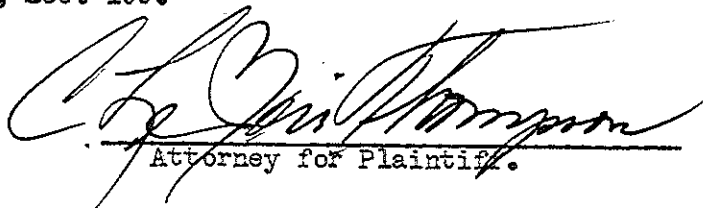
Plaintiff further avers that the injury complained of is the proximate result of the negligence of the defendant's agent or employee while acting within the line or scope of his employment.

Count 2. The Plaintiff claims of the defendants the sum of One Hundred and Sixty Eight Dollars and Thirty Five Cents (\$168.35) as damages for that heretofore, on to-wit, June 2, 1948, Louis Thomas Melton, an agent, servant or employee of the defendant, I.J. Ingram, while acting within the line and scope of his authority as such, was operating an automobile truck, upon and along a public highway, to-wit, U.S. Highway 31, about, to-wit, Twenty Two miles from the Court House in Bay Minette, Alabama,

that at said time and place said servant, agent or employee of the defendant, while acting within the line and scope of his authority wantonly caused or wantonly allowed an automobile truck to run upon or against an automobile in which plaintiff was operating.

Count 3. Plaintiff avers that all ^{of} said injuries and damages herein set out are the proximate result of the wanton conduct of the said Louis Thomas Melton at the time and in the manner herein set out which said wanton conduct consisted in this: Said Louis Thomas Melton while acting within the line and scope of his duty as agent of I.J. Ingram did wantonly cause or wantonly allow an automobile truck to collide with an automobile in which plaintiff was operating thereby proximately causing the injuries and damages complained of and hence this suit.

And plaintiff further avers that the defendants I.J. Ingram and Louis Thomas Melton are and was on the date of said collision, to-wit, the 2nd day of June 1948, non-residents of the state of Alabama, and that the present Post Office address of said defendant I.J. Ingram is 2208 Bonham, Paris Texas, and that the present Post Office address of said defendant Louis Thomas Melton is General Delivery, Paris Texas, and the Plaintiff prays that service of process upon the defendants I.J. Ingram and Louis Thomas Melton may be had in accordance with the provisions of Code 1940, Tit. 7, Sec. 199.


Attorney for Plaintiff.

RECORDED

RECEIVED IN OFFICE

AUG 25 1948

G. A. MOSLEY, Sheriff

m 122 4

RECORDED

W.F. McCLAMMY
VS.

I.J. INGRAM AND
LOUIS THOMAS MELTON

2 copies

EXECUTED BY DELIVERING

2 copies of the within

8-25-48

TO Sibyl Pool

Secretary of State

OF THE State of Ala

AND SAID Sibyl Pool

WAS SUCH WHEN SO SERVED

G.A. Mosley

Sheriff Montgomery County

Goodwyn

COMPLAINT
SUIT FOR DAMAGES

FILED

AUG 19 1948

ALICE J. DUCK, Clerk

FROM THE LAW OFFICES
OF C. LENOIR THOMPSON

Deedman CW

STATE OF ALABAMA §
BALDWIN COUNTY. §

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon I.J. Ingram and Louis Thomas Melton 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 W.F. McClammy.

Witness my hand, this 19 day of August, 1948.

Alice J. Smith
Clerk

W.F. McCLAMMY §
Plaintiff §

VS §

I.J. INGRAM AND §

LOUIS THOMAS MELTON §
Defendants §

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Count 1. Plaintiff claims of the defendants the sum of One Hundred and Sixty Eight Dollars and Thirty Five Cents (\$168.35), in that heretofore and on, to-wit, June 2, 1948, the plaintiff was driving his automobile, upon and along a public highway, to-wit, U.S. Highway 31, about, to-wit, Twenty Two miles from the Court House in Bay Minette, Alabama, and the plaintiff further avers that he was on the right side of the highway as required by law and while so driving his automobile the defendant's employee did negligently and carelessly run the defendant's automobile truck into the plaintiff's automobile and damaged plaintiff's automobile in the aforesaid sum.

Plaintiff further avers that the injury complained of is the proximate result of the negligence of the defendant's agent or employee while acting within the line or scope of his employment.

Count

Count 2. The Plaintiff claims of the defendants the sum of One Hundred and Sixty Eight Dollars and Thirty Five Cents (\$168.35) as damages for that heretofore, on to-wit, June 2, 1948, Louis Thomas Melton, an agent, servant or employee of the defendant, I.J. Ingram, while acting within the line and scope of his authority as such, was operating an automobile truck, upon and along a public highway, to-wit, U.S. Highway 31, about, to-wit, Twenty Two miles from the Court House in Bay Minette, Alabama,

that at said time and place said servant, agent or employee of the defendant, while acting within the line and scope of his authority wantonly caused or wantonly allowed an automobile truck to run upon or against an automobile in which plaintiff was operating.

Count 3. Plaintiff avers that all of said injuries and damages herein set out are the proximate result of the wanton conduct of the said Louis Thomas Melton at the time and in the manner herein set out which said wanton conduct consisted in this: Said Louis Thomas Melton while acting within the line and scope of his duty as agent of I.J. Ingram did wantonly cause or wantonly allow an automobile truck to collide with an automobile in which plaintiff was operating thereby proximately causing the injuries and damages complained of and hence this suit.

And Plaintiff further avers that the defendants I.J. Ingram and Louis Thomas Melton are and was on the date of said collision, to-wit, the 2nd day of June 1948, non-residents of the state of Alabama, and that the present Post Office address of said defendant I.J. Ingram is 2208 Bonham, Paris Texas, and that the present Post Office address of said defendant Louis Thomas Melton is General Delivery, Paris Texas, and the Plaintiff prays that service of process upon the defendants I.J. Ingram and Louis Thomas Melton may be had in accordance with the provisions of Code 1940, Tit. 7, Sec. 199.

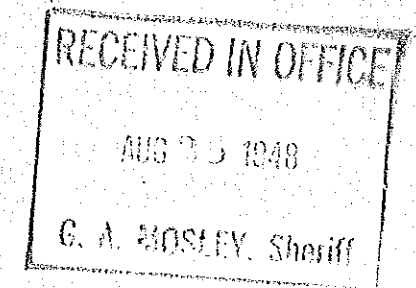

Attorney for Plaintiff.

70 12 24
W.F. McCLANNEY
VS.
I.J. INGRAM AND
LOUIS THOMAS MELTON

COMPLAINT
SUIT FOR DAMAGES

FILED
AUG 19 1948
ALICE J. DUCK, Clerk

FROM THE LAW OFFICES
OF C. LENOIR THOMPSON
BAY MINETTE, ALABAMA



2 copies

EXECUTED BY DELIVERING
2 copies of the within
8-25-48
TO Sibyl Pool
Secretary of State
OF THE State of Ala
AND SAID Sibyl Pool
WAS SUCH WHEN DELIVERED
G. A. Mosley
SHERIFF
Goodwyn

W. F. McClammy, Plaintiff

vs

I. J. Ingram and Louis Thomas
Melton, Defendants

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IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA. AT LAW

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW:

I, Sibyl Pool, Secretary of State, hereby certify that on August 25, 1948 I sent by registered mail in an envelope addressed as follows:

"Mr. I. J. Ingram
2208 Bonham
Paris, Texas"

"Registered mail
Return receipt requested
Deliver to Addressee only"

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

"Mr. I. J. Ingram
2208 Bonham
Paris, Texas"

You will take notice that on August 25, 1948 there was served upon me, in my official capacity, summons and complaint in a case entitled W. F. McClammy, Plaintiff vs I. J. Ingram and Louis Thomas Melton, Defendants in the Circuit Court of Baldwin County, Alabama, At Law, a 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 25th day of August 1948.

Enclosure - 1

Signed) Sibyl Pool
Sibyl Pool, Secretary of State "

I further certify that the notice above set forth which was mailed in the envelope as above set out had attached to it a true copy of the summons and complaint in the above styled cause, there being mailed in the envelope at the time shown the notice with copy of summons and complaint attached thereto.

I further certify that the attached receipt was received by me on August 30, 1948, showing the receipt at Paris Texas, on August 27, 1948, by the designated addressee of said notice with the attached summons and complaint aforesaid, which receipt I attach hereto.

WITNESS MY HAND and the Great Seal of the State of Alabama, this the 30th, day of August 1948.

Sibyl Pool
Secretary of State

Enclosure - 1

RECORDED

W. F. McClammy, Plaintiff

vs

I. J. Ingram and Louis Thomas
Melton, Defendants

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IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA. AT LAW

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW:

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"Mr. I. J. Ingram
2208 Bonham
Paris, Texas"

"Registered mail
Return receipt requested
Deliver to Addressee only"

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"Mr. I. J. Ingram
2208 Bonham
Paris, Texas"

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WITNESS MY HAND and the Great Seal of the State of Alabama, this the 30th, day of August 1948.


Sibyl Pool
Secretary of State

Enclosure - 1



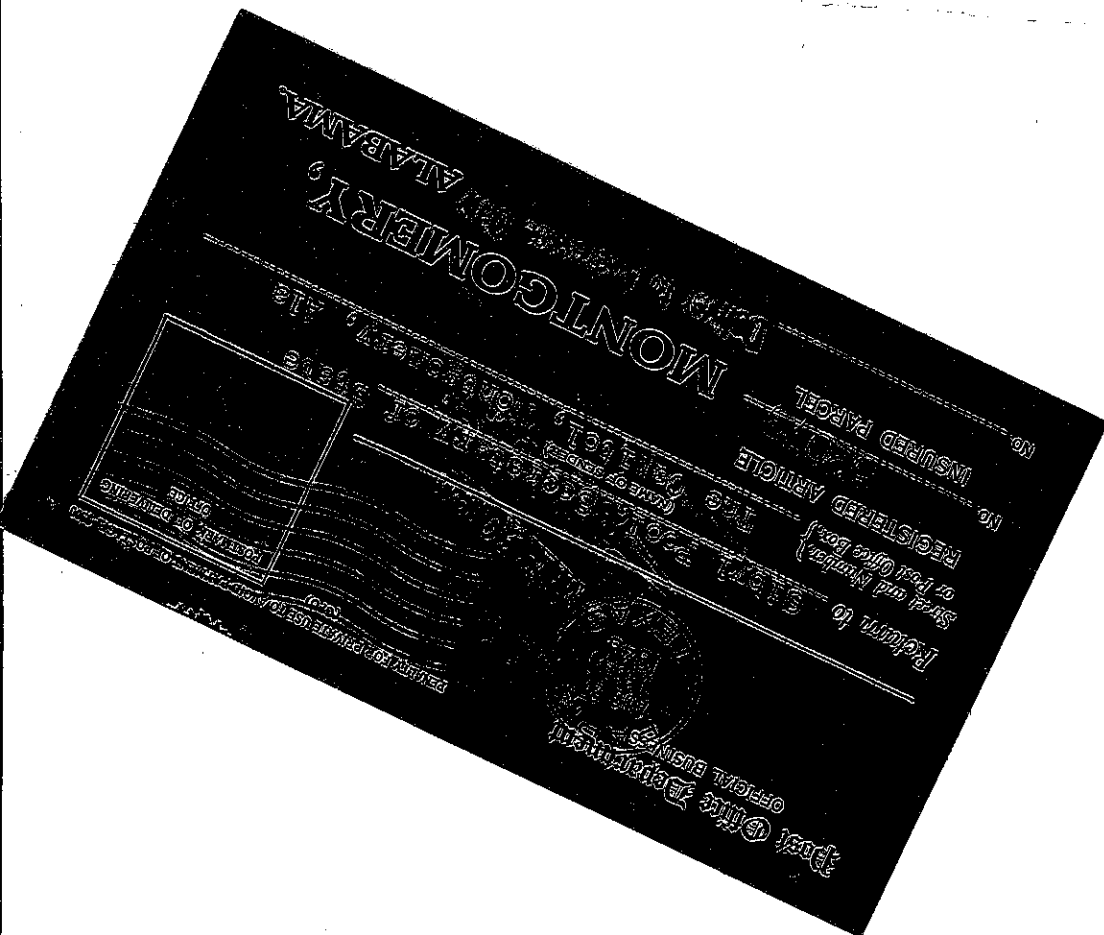
August 30, 1948

Dear Mrs. Duck:

I am unable to locate the address of the Attorney, therefore I am enclosing a copy of the certification to the Court and kindly ask that you please forward it to Mr. Thompson.

Thank you,

Sibyl Pool
Sibyl Pool
Secretary of State



RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1 _____
(Signature or name of addressee)

2 _____
(Signature of addressee if agent, Agent must write signature name on face of card)
10-1209

Date of delivery _____

U. S. POSTMASTER GENERAL'S OFFICE

W. F. McCLAMMY,

Plaintiff,

VS.

I. J. INGRAM & LOUIS
THOMAS MELTON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NUMBER 1224.

MOTION TO STRIKE

Now come the Defendants by their Attorney and move to strike the following described part of the Complaint filed in this cause: "And plaintiff further avers that the defendants I. J. Ingram and Louis Thomas Melton are and was on the date of said collision, to-wit, the 2nd day of June 1948, non-residents of the state of Alabama, and that the present Post Office address of said defendant I. J. Ingram is 2208 Bonham, Paris Texas, and that the present Post Office address of said defendant Louis Thomas Melton is General Delivery, Paris Texas, and the Plaintiff prays that service of process upon the defendants I. J. Ingram and Louis Thomas Melton may be had in accordance with the provisions of Code 1940, Tit. 7, Sec. 199.", and as grounds for said motion say:

1. The above described part of the said Complaint is prolix.

J. B. Blackman
Attorney for Defendants.

Defendants demand a trial of
said cause by jury.

J. B. Blackman
Attorney for Defendants.

Attorney for Defendants.

said cause by law.
Defendants demand a writ of

Attorney for Defendants.

Writ.

1. The above described writ of the said Complaint is
that a writ of habeas corpus for said motion say:

Melton was in custody in accordance with the provisions of Code 1940,
Title of Process upon the defendant I. J. Ingram and Louis Thomas

in General Delivery, said cause, and the Plaintiff said writ
sent Post Office address of said defendant Louis Thomas Melton

defendant I. J. Ingram is 1908 Boston, said cause, and that the pro-
of process, and that the Post Office address of said de-

fusion, said cause, and that the Post Office address of said de-
fendant Louis Thomas Melton was on the date of said cause

cause: and Plaintiff said cause, and that the defendant I. J. In-
gram the following description of the Complaint and that

Now come the Plaintiff said cause, and that the defendant I. J. In-
gram to said

Defendants.

MOTION TO STRIKE.
W. F. McCLAMMY,
Plaintiff,

VS.
I. J. INGRAM & LOUIS THOMAS
MELTON,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NUMBER 1224.

FILED
OCT 3 1948
ALICE J. DUCK, Clerk

THEO. MELTON,
I. J. INGRAM & LOUIS
AS.
Plaintiff,
W. F. McCLAMMY,

AT LAW. NUMBER 1224.
BALDWIN COUNTY, ALABAMA.
IN THE CIRCUIT COURT OF

1224



SIBYL POOL
SECRETARY OF STATE

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE

MONTGOMERY 4, ALABAMA

October 4, 1948

Hon. C. LeNoir Thompson
Attorney-At-Law
Bay Minette, Alabama

Re: W. F. McClammy, Plaintiff
vs

I.J. Ingram & Louis Thomas Melton

Dear Sir:

Further reference is made to the above case in connection with the said defendant, Louis Thomas Melton.

Upon your instructions of September 15th, I, on September 16, 1948, forwarded my notice together with copy of summons and complaint to the said Louis Thomas Melton, Route No. 5, Paris, Texas, via registered mail, return receipt requested and deliver to addressee only.

Said notice has this date been returned to me, with reason for non-delivery being written thereon "Not claimed." This envelope shows evidence of attempted delivery to Mr. Melton also at R. 1, Brookston, Texas.

I shall be glad to renew my efforts upon your further advice.

Sincerely yours,

Sibyl Pool
Secretary of State

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