

JAMES R. OWEN
ATTORNEY AT LAW
110 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA 36507

April 30, 1971

P. O. BOX 248
TEL. 937-2061
AREA CODE 205

Honorable Telfair J. Mashburn
Circuit Judge
Bay Minette, Alabama

Dear Judge:

With the consent of the plaintiff, please
dismiss the case of Mack Ballard vs. Lucy Hughs
Coarsey, which is pending on the law side and is case
number 8911.

Yours very truly,



JAMES R. OWEN

JRO/ers

CC: Mr. Harry J. Wilters
Attorney at Law
Bay Minette, Alabama

8911

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STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Lucy Hughs Coarsey, 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 the same, then and thereto answer the Complaint of Mack Ballard.

Witness my hand, this the 1 day of October, 1969.

Alice J. Duck
Alice J. Duck, Clerk

MACK BALLARD, X
Plaintiff, X
vs. X
LUCY HUGHS COARSEY, X
Defendant. X
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 8911

1.

Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS, as damages, for that heretofore on, to-wit: the 28th day of July, 1969, at approximately .7 miles North of the Rabun-Perdido Exit on Interstate Highway #65 in Baldwin County, Alabama, at a point where the Plaintiff had a right to be in his motor vehicle, at which time and place the Defendant negligently drove her motor vehicle into the rear of the Plaintiff's car, and as a direct and proximate result of the negligence aforesaid, the Plaintiff was injured and damaged as follows: His physical being was shaken and shocked, and he was made sick and sore and was caused to suffer great physical and mental anguish, his chest was severely bruised and sprained; and the Plaintiff was caused to incur expenses in and about procuring doctors, medicine, medical aid and attention and ambulance services, and that he continues to suffer greatly as a result of his injuries; that the Plaintiff's

motor vehicle was bent and damaged about the rear, and that it was a total loss as a result of the aforesaid negligence by the Defendant. The Defendant is a non-resident of the State of Alabama, whose last known address is: P. O. Box 126, Lake Placid, Florida.

WILTERS & BRANTLEY

BY:

Ray J. Wilters, Jr.

Service of process may be had upon the Secretary of State of the State of Alabama, by authority of Title 7, Section 199 Code of Alabama as recompiled in 1958.

Defendants address is:
P. O. Box 126
Lake Placid, Florida

FILED

OCT 1 1969

ALICE J. DUCK

CLERK
REGISTER

297

(3)

RECEIVED IN OFFICE
OCT 3 1969
M. S. BUTLER, Sheriff

no. 8911

RECEIVED

OCT 2 1969

WILKINS

Mack Ballard

vs.

Lucy Hughs Coarsey

Executed by serving 3 copies of
to within 30 days
Secretary of State of The State of
Alabama.
This the 3 day of Oct. 1969

Sheriff of Montgomery County
M. S. Butler,
By W. L. Moser 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 of 1
process(es) or a total of \$2.50

W. L. Moser Deputy Sheriff

FILED

OCT 1 1969

ALICE J. DUCK CLERK
REGISTER

Walters & Brantley

MACK BALLARD,

Plaintiff,

VS.

LUCY HUGHS COARSEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

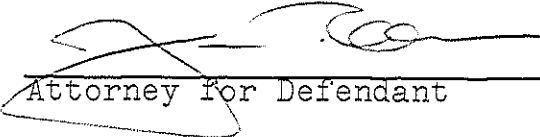
AT LAW NO. 8911

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause says:

1. Not guilty.

2. For further plea and by way of recoupment the defendant claims of the plaintiff Ten Thousand Dollars (\$10,000.00) for that heretofore on to-wit, July 28, 1969, at a point which is approximately .7 of a mile North of the Rabun-Perdido exit on Interstate Highway 65 in Baldwin County, Alabama, the said plaintiff so negligently operated a motor vehicle so as to cause the defendant's automobile to run into, upon or against the plaintiff's automobile and as a direct and proximate result of the negligence of the said plaintiff, the defendant was injured and damaged; she was made sick, sore and nervous; she was severely bruised and sprained and she was caused to incur expenses in and about procuring doctors, medicine, medical aid and attention and that she continues to suffer as a result of her said injuries; that the defendant's motor vehicle was bent and damaged and it was a total loss as a result of the aforesaid negligence of the plaintiff.


Attorney for Defendant

FILED

OCT 31 1969

ALICE J. DUCK CLERK
REGISTER

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October 10, 1969

MACK BALLARD, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

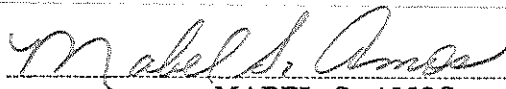
LUCY HUGHS COARSEY, Defendant

CASE NO. 8911

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

I, Mabel Amos, Secretary of State, hereby certify that on October 3, 1969
I sent by certified mail in an envelope addressed as follows:"Lucy Hughs Coarsey
P. O. Box 126
Lake Placid, Florida 33852""Certified 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:"Lucy Hughs Coarsey
P. O. Box 126
Lake Placid, Florida 33852"You will take notice that on October 3, 1969 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: MACK BALLARD, Plaintiff VS LUCY HUGHS COARSEY, Defendantin the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 8911 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 3rd
day of October, 1969

Enclosure (1)

(Signed) Mabel Amos
Secretary of State"I further certify 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 in the above-styled
cause.I further certify that on October 10, 1969 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Lake Placid, ———
on 10-8-69WITNESS MY HAND and the Great Seal of the State of Alabama this the 10th day
of October, 1969MABEL S. AMOS
Secretary of StateEnclosures: Return Receipt Card and copy
of Summons and Complaint.
CC: Honorable Harry J. Wilters
Wilters & Bradley
Court House Square
Bay Minette, Alabama 36507

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Lucy Hughs Coarsey, 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 the same, then and thereto answer the Complaint of Mack Ballard.

Witness my hand, this the 1st day of October, 1969.

Alice J. Duck
Alice J. Duck, Clerk

MACK BALLARD,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
		BALDWIN COUNTY, ALABAMA
vs.	X	
		AT LAW
LUCY HUGHS COARSEY,	X	
		CASE NO. <u>8911</u>
Defendant.	X	
	1.	

Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS, as damages, for that heretofore on, to-wit: the 28th day of July, 1969, at approximately .7 miles North of the Rabun-Perdido Exit on Interstate Highway #65 in Baldwin County, Alabama, at a point where the Plaintiff had a right to be in his motor vehicle, at which time and place the Defendant negligently drove her motor vehicle into the rear of the Plaintiff's car, and as a direct and proximate result of the negligence aforesaid, the Plaintiff was injured and damaged as follows: His physical being was shaken and shocked, and he was made sick and sore and was caused to suffer great physical and mental anguish, his chest was severely bruised and sprained; and the Plaintiff was caused to incur expenses in and about procuring doctors, medicine, medical aid and attention and ambulance services, and that he continues to suffer greatly as a result of his injuries; that the Plaintiff's

motor vehicle was bent and damaged about the rear, and that it was a total loss as a result of the aforesaid negligence by the Defendant. The Defendant is a non-resident of the State of Alabama, whose last known address is: P. O. Box 126, Lake Placid, Florida.

WILTERS & BRANTLEY

BY: *[Signature]*

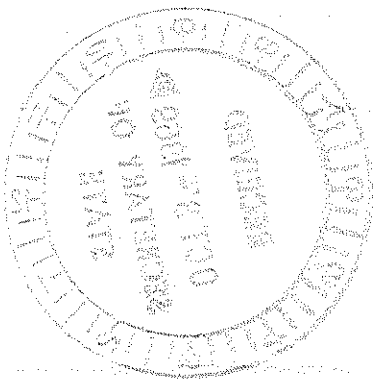
Service of process may be had upon the Secretary of State of the State of Alabama, by authority of Title 7, Section 199 Code of Alabama as recompiled in 1958.

Defendants address is:
P. O. Box 126
Lake Placid, Florida

FILED

OCT 1 1969

ALICE J. DUCK CLERK
REGISTER



8911

water vehicle was bent and damaged about the rear, and that it was

a total loss as a result of the aforesaid negligence by the

Defendant. The Defendant is a non-resident of the State of Alabama,

whose last known address is: P. O. Box 126, Lake Placid, Florida.

WITNESSES & EXHIBITS

[Handwritten signature]

Seal of process was laid upon the Secretary of State of the State of Alabama, by authority of Title 1, Section 136 Code of Alabama as recompiled in 1958.

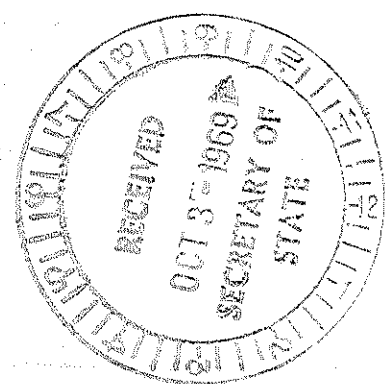
Defendant's address is:
P. O. Box 126
Lake Placid, Florida

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FILED

OCT 1 1969

RECEIVED



INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Show to whom, date, and address where delivered

☒ Deliver ONLY to addressee

(Additional charges required for these services)

RECEIPT

Received the numbered article described below.

REGISTERED NO.

SIGNATURE OR NAME OF ADDRESSEE (Must always be filled in)

CERTIFIED NO.

51377

1

Lucy H. Coarsey

INSURED NO.

2

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

Deliver to addressee only

DATE DELIVERED

SHOW WHERE DELIVERED (only if requested)

10-8-69

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70192

POST OFFICE, STATE, AND ZIP CODE

STREET AND NO. OR P.O. BOX

SECRETARY OF STATE
MONTGOMERY, ALABAMA

NAME OF SENDER

RECEIPT REQUESTED

INSTRUCTIONS: Show name and address below and complete instructions on other side, where applicable. Moistened gummed ends, seal and hold firmly in place. of article. Print on back of article. Receipt REQUESTED.

TO RETURN

POSTMARK OF DELIVERING OFFICE

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE, \$300

POD Form 3811 Apr. 1967

5010-10-71348-10

