

FOREST A. CHRISTIAN
ATTORNEY AT LAW
P. O. DRAWER 190
AREA CODE 205 — PHONE 943-2201
FOLEY, ALABAMA 36535

11 September 1970

Hon. Telfair Mashburn
Bay Minette, Alabama 36507

Dear Hon. Mashburn:

In the case of Bessie A. Roberts, No. 8951, set for September 18, 1970, I am withdrawing from the case. I discussed this with Mrs. Bessie A. Roberts whom I have known for 20 years. Her husband died 7 or 8 years ago. Back in October shortly after my heart surgery, she came to my office on other business and as she was leaving she said the sheriff had served her with a certain paper. I looked at it and told her it should be answered promptly and that although Pensacola attorneys filed a claim, no doubt, they would obtain local cancel. I suggested to her that she should consult a lawyer of her choice but she has been very neglectful. Last August, she and her daughter prepared a statement when it was fresh on their mind which is all part of the file which I returned to them. They promised me diligently that they would obtain other local cancel without delay and that I was withdrawing from the case.

Cordially yours,



FOREST A. CHRISTIAN

SHIMEK AND MCGRAW

ATTORNEYS AT LAW

517 NORTH BAYLEN STREET

PENSACOLA, FLORIDA 32502

PAUL SHIMEK, JR.
ARTICE L. MCGRAW

POST OFFICE BOX 661
TELEPHONE 434-2302

October 20, 1969

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

Re: Jeannette L. Hughey and Michael Allen Hughey, a minor, by his
next friend, Jeannette L. Hughey, vs. Bessie A. Roberts

Dear Miss Duck:

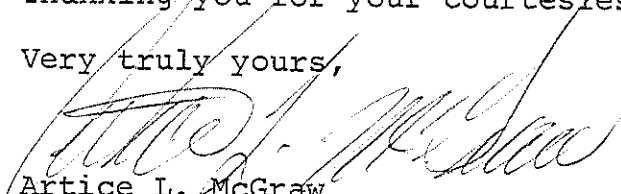
Please find enclosed a complaint and copy thereof against Bessie A. Roberts. Would you please have the Sheriff serve the complaint on Miss Roberts in Gulf Shores, Alabama. I do not know Miss Roberts' specific address; however, I do know that she owns a number of cottages in Gulf Shores and makes her home in one of them.

I also do not know the charges for filing this suit and would request that if there are any charges, you would please notify me in order that I may forward my check.

I am presently practicing law in Pensacola, Florida; however, I am also a member of the Alabama Bar, therefore, I would greatly appreciate any procedural aid which you may offer.

Thanking you for your courtesies, I remain

Very truly yours,


Artice L. McGraw

ALMcG/jls

Enclosures (2)

1. The first part of the report

2. The second part of the report

3. The third part of the report

4. The fourth part of the report

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25. The twenty-fifth part of the report

26. The twenty-sixth part of the report

720.8957

1. off order
2. CB

REGINALD H. STEPHENS
Attorney at Law
Suite 412 First Federal Tower
Corner Airport Blvd. at I-65
Mobile, Alabama 36606

January 11, 1971

478 - 6389

Circuit Court
Baldwin ~~Mobile~~ County Court House
Baldwin, ~~Mobile~~, Alabama

RE: Jeannette L. Hughey and Michael Allen Hughey vs.
Bessie A. Roberts Case No. 8,951
(PLEASE REFER TO ITEMS CHECKED BELOW)

Dear Sir:

1. () Please issue an alias (pluries) complaint and summons at the following address:
2. () Please issue a Writ of Discovery to the Defendant, commanding him to file in Court a sworn list of his assets, if any.
3. () Please discharge the garnishee in the above styled cause.
4. () Please also send a notice of the garnishment release to the garnishee.
5. () Please furnish me with a Certificate of Judgment in the above case. My check in the amount of \$.50 is enclosed.
6. () Please issue an alias execution against the Defendant.
7. () Please dismiss the above case on motion of Plaintiff.
8. ~~XXXXXX~~ () Please enter a non-suit in the above case on motion of Plaintiff.
9. () Please find my check enclosed in the amount of \$ _____ to pay the Court costs.
10. () Please send me your bill of costs.

REMARKS:

FILED

JAN 13 1971

ALICE J. DUCK CLERK
REGISTER

Sincerely yours,

Reginald H. Stephens

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 - PHONE 943-2201

FOLEY, ALABAMA 36535

16 November 1970

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

Re: Mrs. Bessie A. Roberts
Gulf Shores, Alabama

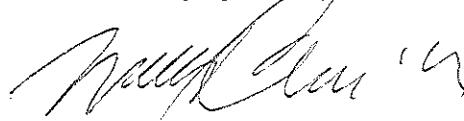
Dear Mrs. Duck:

8951

Several months ago, probably in August, I discussed this case with the defendant, Mrs. Bessie A. Roberts, and it was my understanding that she went to Bay Minette to obtain another attorney since I was withdrawing from the case as I am still recovering from my heart surgery. Therefore, kindly remove my name as attorney for the defendant. I am sending a copy of this to Mrs. Roberts to inform her.

By copy of this letter, I am again instructing Mrs. Roberts to attend to this matter at once because it is very important that she have an attorney to defend her in this case.

Cordially yours,



FOREST A. CHRISTIAN

FEB 11 1971

NOV 17, 1970

ALIE

CLERK
REGISTER

JEANETTE L. HUGHEY and
MICHAEL ALLEN HUGHEY,
a minor, by his next friend,
JEANETTE L. HUGHEY

Plaintiffs

VS.

BESSIE A. ROBERTS

Defendant

: IN THE CIRCUIT COURT OF
:
: BALDWIN COUNTY, ALABAMA
:
:
:
: AT LAW
:
:
: CASE NO. 8951
:

NOTICE OF APPEARANCE AS
ATTORNEY OF RECORD
FOR PLAINTIFFS

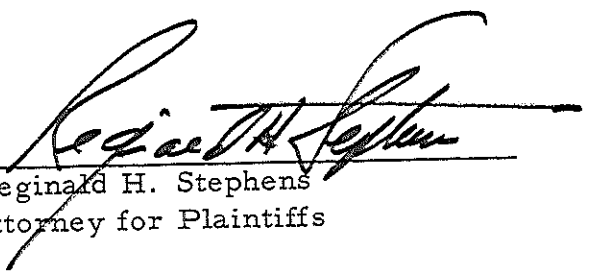
COMES now Reginald H. Stephens, Attorney at Law, 2062
Dauphin Street, Mobile, Alabama, 36606, and files this appearance
as one of the Attorney's for the above named Plaintiffs. All
corrospondence relating to the above styled cause should be
directed to myself and the Honorable Artice L. McGraw of
Pensacola, Florida.

FILED

SEP 5 1969

ALICE J. DUCK

CLERK
REGISTER


Reginald H. Stephens
Attorney for Plaintiffs

1. The first part of the report is a general introduction to the subject of the study.	:	The first part of the report is a general introduction to the subject of the study.
2. The second part of the report is a detailed description of the methods used in the study.	:	The second part of the report is a detailed description of the methods used in the study.
3. The third part of the report is a detailed description of the results of the study.	:	The third part of the report is a detailed description of the results of the study.
4. The fourth part of the report is a detailed description of the conclusions of the study.	:	The fourth part of the report is a detailed description of the conclusions of the study.
5. The fifth part of the report is a detailed description of the recommendations of the study.	:	The fifth part of the report is a detailed description of the recommendations of the study.

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8951

JEANNETTE L. HUGHEY and MICHAEL X
ALLEN HUGHEY, a minor, by his
next friend, JEANNETTE L. HUGHEY, X IN THE CIRCUIT COURT OF
PLAINTIFFS, X BALDWIN COUNTY, ALABAMA
VS: X AT LAW
BESSIE A. ROBERTS, X CASE NO. 8951
DEFENDANT. X

DEMURRER

Comes the Defendant in the above styled cause and demurs to the Plaintiff's complaint and to each count thereof separately and severally, and as grounds therefor sets down and assigns the following separately and severally:

1. The allegations of said complaint are vague, indefinite and uncertain.
2. The allegations of said count are mere conclusions of the pleader.
3. Said complaint fails to state a cause of action.
4. Said count fails to state a cause of action.
5. Said count fails to state a cause of action.
6. Said count fails to state a cause of action.


Forest A. Christian, Attorney for
Defendant.

FILED

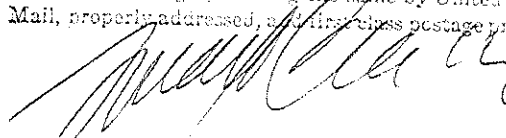
OCT 29 1969

ALICE J. DUCK

CLERK
REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this the _____
day of OCT 27 1969, 1969, served a
copy of the foregoing pleading on counsel for all parties
to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.



[illegible][illegible]
$$\begin{aligned} \frac{1}{2} &= \frac{1}{2} \cdot \frac{1}{2} = \frac{1}{4} \\ \frac{1}{2} &= \frac{1}{2} \cdot \frac{1}{2} = \frac{1}{4} \end{aligned}$$
[illegible]

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D). The concentration of the *Agrobacterium* suspension was 10⁶ cells/ml (A), 10⁷ cells/ml (B), 10⁸ cells/ml (C), and 10⁹ cells/ml (D).

[illegible]

Figure 1. Schematic representation of the experimental design. The subjects were divided into two groups: the control group (CG) and the experimental group (EG). The CG was divided into two subgroups: the control group (CG) and the control group (CG). The EG was divided into two subgroups: the experimental group (EG) and the experimental group (EG). The subjects were divided into two groups: the control group (CG) and the experimental group (EG). The CG was divided into two subgroups: the control group (CG) and the control group (CG). The EG was divided into two subgroups: the experimental group (EG) and the experimental group (EG).

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2.

1

$$H_{\text{eff}} = H_0 + H_1 + H_2 + \dots$$
[illegible][illegible]

Journal of Interpersonal Violence 26(10) 1978-1997
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[illegible][illegible]

IN THE TWENTY-EIGHTH JUDICIAL CIRCUIT OF
ALABAMA, BALDWIN COUNTY, IN LAW

JEANNETTE L. HUGHEY and MICHAEL)
ALLEN HUGHEY, a minor, by his)
next friend, JEANNETTE L. HUGHEY,)
Plaintiffs,)
vs.)
BESSIE A. ROBERTS,)
Defendant.)

Case No. 8951

C O M P L A I N T

COME NOW the Plaintiffs, by their undersigned attorney,
in the above-styled cause suing the Defendant and alleging as fol-
lows:

(1) The Plaintiff, JEANNETTE L. HUGHEY, is a bona fide
resident of Baldwin County, Alabama, and is over the age of twenty-
one (21) years.

(2) The Plaintiff, MICHAEL ALLEN HUGHEY, a minor, is a
bona fide resident of Baldwin County, Alabama, and is suing by his
next friend and mother, JEANNETTE L. HUGHEY.

(3) The Defendant, BESSIE A. ROBERTS, resides in Gulf
Shores, Baldwin County, Alabama. The said Defendant, BESSIE A.
ROBERTS, is over the age of twenty-one (21) years and is a resident
of Baldwin County, Alabama.

(4) The Plaintiffs claim of the Defendant Twenty Five
Thousand and 00/100 (\$25,000.00) Dollars damages for maliciously
and without probable cause therefor causing the Plaintiffs to be
arrested under a warrant issued by R. O. Burgess, a Justice of the
Peace, Baldwin County, Gulf Shores, Alabama, on or about the 25th
day of July, A.D., 1969, on a charge of larceny, which charge, be-
fore the commencement of this action, has been judicially investi-
gated and said prosecution ended and the Plaintiffs discharged.

(5) The Plaintiffs, JEANNETTE L. HUGHEY and MICHAEL ALLEN
HUGHEY, claim of the Defendant, BESSIE A. ROBERTS, Twenty Five
Thousand and 00/100 (\$25,000.00) Dollars damages for falsely and

maliciously charging the Plaintiffs of larceny by speaking of and converning them in the presence of divers persons, in substance as follows: "That the Plaintiffs committed a theft of the Defendant's watch while in the Defendant's home as guests", on or about the 25th day of July, A.D., 1969, and on or about the 15th and 16th days of September, A.D., 1969.

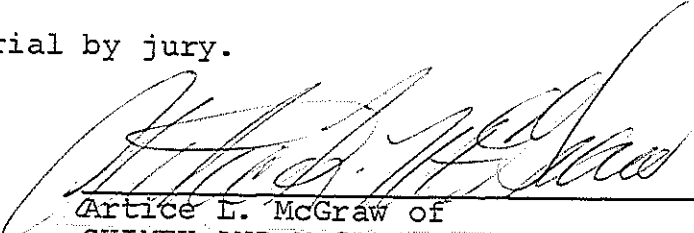
(6) The Plaintiff, JEANNETTE L. HUGHEY, claims of the Defendant, BESSIE A. ROBERTS, Twenty Five Thousand and 00/100 (\$25,000.00) Dollars damages for falsely and maliciously stating to divers persons that: "The said Plaintiff, JEANNETTE L. HUGHEY, was a drunkard, a lush, and a totally unfit mother, and spent most of her time drinking in various liquor spots throughout Baldwin County", on or about the 15th and 16th day of September, A.D., 1969.

WHEREFORE, the premises considered, the Plaintiffs, JEANNETTE L. HUGHEY and MICHAEL ALLEN HUGHEY, a minor, by his next friend, JEANNETTE L. HUGHEY, pray that they recover the sum of Fifty Thousand and 00/100 (\$50,000.00) Dollars against the Defendant, BESSIE A. ROBERTS, for the offenses as alleged in Counts Four (4) and Five (5) above and demand a trial by jury.

WHEREFORE, the premises considered, the Plaintiff, JEANNETTE L. HUGHEY, in addition to the above prays for damages of Twenty Five Thousand and 00/100 (\$25,000.00) Dollars against the Defendant, BESSIE A. ROBERTS, for the offense as stated in Count Six (6) above and demands a trial by jury.

Plaintiffs' Address:
Post Office Box 292
Lillian, Alabama

Defendant's Address:
Gulf Shores
Alabama


Artice L. McGraw of
SHIMEK AND MCGRAW
517 North Baylen Street
Pensacola, Florida 32502
Attorneys for JEANNETTE L. HUGHEY
and MICHAEL ALLEN HUGHEY, a minor,
by his next friend, JEANNETTE L.
HUGHEY

FILED

OCT 22 1969

ALICE J. BUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8951

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BESSIE A. ROBERTS

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.....

..... BESSIE A. ROBERTS Defendant.....

by JEANNETTE L. HUGHEY & MICHAEL ALLEN HUGHEY, a minor by his next friend.....

..... JEANNETTE L. HUGHEY Plaintiff.....

Witness my hand this..... 22nd day of..... October 19.69...

..... Alice J. Luck Clerk

2410-23-69

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JEANNETTE L. HUGHEY & MICHAEL
ALLEN HUGHEY, a minor, by his.....next friend, JEANNETTE L. HUGHEY
Plaintiffs

vs.

BESSIE A. ROBERTS
Defendants

SUMMONS AND COMPLAINT

Filed October 22, 1969

Alice J. Duck Clerk

SHIMEK & McGRAW

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received In Office

OCT 22 1969

19.....

TAYLOR WILKINS

Sheriff

I have executed this summons

this Oct 23 1969

by leaving a copy with

Bessie A. Roberts

sheriff claims 100 miles

Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff

Deputy Sheriff

Taylor Wilkins Sheriff

Deputy Sheriff

Dear Eunice:

Please attach to docket sheet.

M. Bullock