

STATE OF ALABAMA)

COUNTY OF BALDWIN)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons FELIX HEARD to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of EMMA TRICOCHE, as Administratrix of the Estate of Yvonne Phipps, deceased.

Witness this 5 day of Nov., 1969.


CLERK OF CIRCUIT COURT

EMMA TRICOCHE, as Administratrix)	IN THE CIRCUIT COURT
of the Estate of YVONNE PHIPPS,)	OF BALDWIN COUNTY,
deceased,)	
Plaintiff.)	ALABAMA.
-vs-)	AT LAW.
FELIX HEARD,)	CASE NO. <u>8976</u>
Defendant.)	

COUNT ONE

Plaintiff claims of the Defendant the sum of ONE HUNDRED THOUSAND (\$100,000.00) DOLLARS, damages, for that heretofore and on, to-wit, July 12, 1969, the Plaintiff's intestate, YVONNE PHIPPS, was riding as a passenger for hire in a motor vehicle operated by the Defendant, over which Plaintiff's intestate had no charge or control on County Road 24 at a point thereon, to-wit, 1.2 miles West of the city limits of Foley, at which point said road is a


public road in Baldwin County, Alabama, and at said time and place, the Defendant so negligently operated his motor vehicle on said County Road 24 as to cause the same to strike a bridge, and as a direct and proximate consequence of the negligence of the Defendant as aforesaid, Plaintiff's intestate suffered injuries which proximately caused her death on, to-wit, July 12, 1969.

COUNT TWO

Plaintiff claims of the Defendant the sum of ONE HUNDRED THOUSAND (\$100,000.00) DOLLARS, damages, for that heretofore and on, to-wit, July 12, 1969, the Plaintiff's intestate, YVONNE PHIPPS, was riding in a motor vehicle operated by the Defendant, over which Plaintiff's intestate had no charge or control, on County Road 24 at a point thereon, to-wit, 1.2 miles West of the city limits of Foley, at which point said road is a public road in Baldwin County, Alabama, and at said time and place, the Defendant wantonly inflicted injuries upon the Plaintiff's said intestate, which proximately caused her death on, to-wit, July 12, 1969, by so wantonly operating his motor vehicle on said County Road 24 as to cause the same to strike a bridge, thereby directly and proximately causing the death of the said Yvonne Phipps.


JAMES R. OWEN
ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.


JAMES R. OWEN

FILED

Address of Defendant:

N.F.
Felix Heard
808 East Azalea Street
Foley, Alabama

NOV 5 1969

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ALICE J. DUCK CLERK
REGISTER

Received 6 day of Nov 1969
and on day of 19
I served a copy of the within AKC
on Delix Heard
By service on
TAYLOR WILKINS, Sheriff
By D. S.

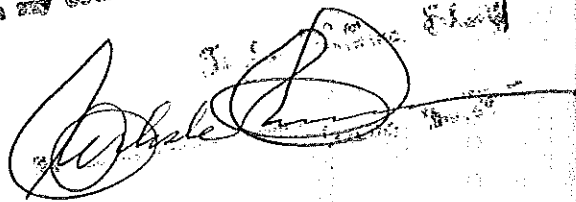
8976
Emma Tricoche, as Adm.
of the Estate of
Gronne Phipps, deceased
Plty -
vs.
Delix Heard

FILED

NOV 5 1969

ALICE J. DUCK CLERK
REGISTER

12 day of Nov 1969
I have searched the records of my county after diligent search and to



James R. Owen, Atty

STATE OF ALABAMA)
COUNTY OF BALDWIN)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summons FELIX HEARD to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of EMMA TRICOCHE, as Administratrix of the Estate of Yvonne Phipps, deceased.

Witness this 5th day of Nov., 1969.


CLERK OF CIRCUIT COURT

EMMA TRICOCHE, as Administratrix)	IN THE CIRCUIT COURT
of the Estate of YVONNE PHIPPS,)	
deceased,)	OF BALDWIN COUNTY,
Plaintiff.)	ALABAMA.
-vs-)	AT LAW.
FELIX HEARD,)	CASE NO. <u>8976</u>
Defendant.)	

COUNT ONE

Plaintiff claims of the Defendant the sum of ONE HUNDRED THOUSAND (\$100,000.00) DOLLARS, damages, for that heretofore and on, to-wit, July 12, 1969, the Plaintiff's intestate, YVONNE PHIPPS, was riding as a passenger for hire in a motor vehicle operated by the Defendant, over which Plaintiff's intestate had no charge or control on County Road 24 at a point thereon, to-wit, 1.2 miles West of the city limits of Foley, at which point said road is a

public road in Baldwin County, Alabama, and at said time and place, the Defendant so negligently operated his motor vehicle on said County Road 24 as to cause the same to strike a bridge, and as a direct and proximate consequence of the negligence of the Defendant as aforesaid, Plaintiff's intestate suffered injuries which proximately caused her death on, to-wit, July 12, 1969.

COUNT TWO

Plaintiff claims of the Defendant the sum of ONE HUNDRED THOUSAND (\$100,000.00) DOLLARS, damages, for that heretofore and on, to-wit, July 12, 1969, the Plaintiff's intestate, YVONNE PHIPPS, was riding in a motor vehicle operated by the Defendant, over which Plaintiff's intestate had no charge or control, on County Road 24 at a point thereon, to-wit, 1.2 miles West of the city limits of Foley, at which point said road is a public road in Baldwin County, Alabama, and at said time and place, the Defendant wantonly inflicted injuries upon the Plaintiff's said intestate, which proximately caused her death on, to-wit, July 12, 1969, by so wantonly operating his motor vehicle on said County Road 24 as to cause the same to strike a bridge, thereby directly and proximately causing the death of the said Yvonne Phipps.


JAMES R. OWEN
ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.


JAMES R. OWEN

Address of Defendant:

Felix Heard
808 East Azalea Street
Foley, Alabama

FILED

NOV 5 1969

ALICE J. DUCK CLERK
REGISTER