

THE STATE OF ALABAMA }
Baldwin
Montgomery County

To any Sheriff of the State of Alabama—GREETING:

You are Hereby Commanded to Summon

Curtis Foster
Bay Minette, Alabama

to appear before the Circuit Court of Montgomery County, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of

Margaret Age

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this 26th day of June 1953
A. J. Smith Clerk.

COMPLAINT

THE STATE OF ALABAMA Baldwin Bay Minette Montgomery, Alabama	VS.	In the Circuit Court of Baldwin Montgomery County
Margaret Age		Term, 19
Plaintiff.		Curtis Foster Defendant.

COUNT 1

The plaintiff claims of the Defendant the sum of \$10,000.00 as damages for that heretofore on to-wit, January 9, 1953, plaintiff avers that she was riding in an automobile on a public highway, to-wit, at or near the intersection of U. S. 31 and Alabama Highway No. 3 in Baldwin County, Alabama, and that then and there, at said time and place, defendant's servant, agent or employee, while acting in the line and scope of his authority, negligently ran a motor vehicle truck belonging to the defendant, into, upon or against the automobile in which the plaintiff was riding, and as the proximate consequence and result of the negligence of the defendant's agent, servant or employee while acting in the line and scope of his authority, plaintiff received severe personal injuries in this, to-wit:

She was made sick, sore and lame; she was rendered unconscious; she was bruised and lacerated; she suffered a severe scalp wound; she suffered a severe loss of blood; she suffered a number of contusions and abrasions on her body; her back, neck and shoulder were bruised; she suffered and continues to suffer great mental anguish and physical pain; she was permanently injured; she was internally injured; for all of which she claims damages aforesaid, hence this suit.

COUNT 2

Plaintiff claims of the defendant the sum of \$10,000.00 as damages for that heretofore on, to-wit, January 9, 1953, plaintiff alleges she was riding in an automobile on a public highway, to-wit, at or near the intersection of U. S. 31 and Alabama Highway No. 3 in Baldwin County, Alabama, and on said day and date and at such time and place, the defendant's servant, agent or employee while acting in the line and scope of his employment, with reckless indifference to the consequences, wilfully or wantonly injured plaintiff by wilfully or wantonly running a motor vehicle truck belonging to the defendant into or upon or against the automobile in which the plaintiff was riding, said agent, servant or employee being conscious at the time that his conduct in so doing would probably result in disaster to the plaintiff, and by reason thereof and as proximate result of the consequence thereof, plaintiff received severe personal injuries in this, to-wit:

She was made sick, sore and lame; she was rendered unconscious; she was bruised and lacerated; she suffered a severe scalp wound; she suffered a severe loss of blood; she suffered a number of contusions and abrasions on her body; her back, neck and shoulder were bruised; she suffered and continues to suffer great mental anguish and physical pain; she was permanently injured; she was internally injured; for all of which she claims damages aforesaid, hence this suit.

CAPELL, HOWARD & COBBS and J. B. Blackburn

J. B. Blackburn
Attorneys for Plaintiff

969

Received in office

day of

19

Sheriff.

Executed by serving

Top y

of the within Summons and Complaint on

Defendant this the *Aug 14* day of

August, Daggett 1953
in Sec of State

J. R. Mosley Sheriff.

J. R. Mosley
Stones

RECORDED

No. 2026

Margaret Age

vs.

Curtis Foster
Bay Minette, Alabama

CIRCUIT COURT
Baldwin
OF MONTGOMERY COUNTY

Term, 19

SUMMONS AND COMPLAINT

Filed in office this *26th* day of

June A. D. 1953
Eric J. Duck
Clerk.

Plaintiff's Attorney.

IN THE CIRCUIT COURT

Margaret Age, Plaintiff

vs

Curtis Foster, Defendant

of
BALDWIN COUNTY,
ALABAMA

Case No. 2026

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

I, Agnes Baggett, Secretary of State, hereby certify that on August 14, 1953, I sent by registered mail in an envelope addressed as follows:

"Curtis Foster
West Fairfield Drive
Pensacola, Florida"

"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:

"Curtis Foster
West Fairfield Drive
Pensacola, Florida

You will take notice that on August 14, 1953 the Sheriff of Montgomery County, Alabama served upon me, in my official capacity, summons and complaint in a case entitled Margaret Age, Plaintiff vs Curtis Foster,

Defendants in the Circuit Court of Baldwin

County, Alabama, Case No. 2026, 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 14 day of August, 1953.

Signed) Agnes Baggett

Mrs. Agnes Baggett


Secretary of State "

Enclosures - 1

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 August 27, 1953, I received the return card, showing receipt by the designated addressee of the aforementioned matter, at Myrtle Grove, Florida on August 26, 1953.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 27 day of August, 1953.


Mrs. Agnes Baggett
Secretary of State

Enclosures - (Return card
and copy of summons and
complaint)



MARGARET AGE,

Plaintiff,

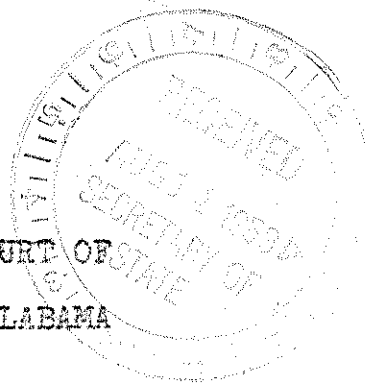
VS.

CURTIS FOSTER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW



STATE OF ALABAMA)

BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared J. B. Blackburn, who first being duly and legally sworn, deposes and says:

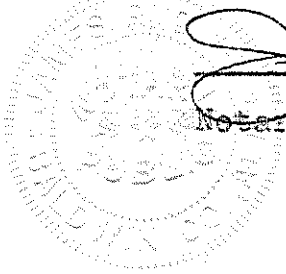
That he is one of the attorneys of record for the Plaintiff in the above styled cause.

That he is informed and verily believes that the Defendant, Curtis Foster, is a non-resident of the State of Alabama, but that he was a resident of the State of Alabama on the 9th day of January, 1953, and that he was doing business in the State of Alabama on said date, and that the present Post Office address of said defendant is West Fairfield Drive, Pensacola, Florida; and that he believes that service of process upon the defendant, Curtis Foster, in accordance with the provisions of Title 7, Section 199, of the 1940 Code of Alabama, as Amended, is necessary to perfect service upon the said defendant.

J. B. Blackburn

Sworn to and subscribed before me on
this the 12th day of August, 1953.

James R. Daw
Notary Public, Baldwin County, Alabama



STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon Curtis Foster to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of Margaret Age. And you are hereby commanded to execute this process instantler and make return as required by law.

Witness my hand this 26th day of June, 1953.

Alice J. Duck
Clerk.

MARGARET AGE,

Plaintiff,

VS.

CURTIS FOSTER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

C O U N T O N E

The plaintiff claims of the defendant the sum of \$10,000.00 as damages for that heretofore on to-wit, January 9, 1953, plaintiff avers that she was riding in an automobile on a public highway, to-wit, at or near the intersection of U. S. 31 and Alabama Highway No. 3 in Baldwin County, Alabama, and that then and there, at said time and place, defendant's servant, agent or employee, while acting in the line and scope of his authority, negligently ran a motor vehicle truck belonging to the defendant, into, upon or against the automobile in which the plaintiff was riding, and as the proximate consequence and result of the negligence of the defendant's agent, servant or employee while acting in the line and scope of his authority, plaintiff received severe personal injuries in this, to-wit:

She was made sick, sore and lame; she was rendered unconscious; she was bruised and lacerated; she suffered a severe scalp wound; she suffered a severe loss of blood; she suffered a number of contusions and abrasions on her body; her back, neck and shoulder were bruised; she suffered and continues to suffer great mental anguish and physical pain; she was permanently injured; she was internally injured; for all of which she claims damages aforesaid, hence this suit.

C O U N T T W O

Plaintiff claims of the defendant the sum of \$10,000.00 as damages for that heretofore on, to-wit, January 9, 1953, plaintiff alleges she was riding in an automobile on a public highway, to-wit, at or near the intersection of U. S. 31 and Alabama Highway No. 3 in Baldwin County, Alabama, and on said day and date, and at such time and place, the defendant's servant, agent or employee while acting in the line and scope of his employment, with reckless indifference to the consequences, wilfully or wantonly injured plaintiff by wilfully or wantonly running a motor vehicle truck belonging to the defendant into or upon or against the automobile in which the plaintiff was riding, said agent, servant or employee being conscious at the time that his conduct in so doing would probably result in disaster to the plaintiff, and by reason thereof and as proximate result of the consequence thereof, plaintiff received severe personal injuries in this, to-wit:

She was made sick, sore and lame; she was rendered unconscious; she was bruised and lacerated; she suffered a severe scalp wound; she suffered a severe loss of blood; she suffered a number of contusions and abrasions on her body; her back, neck and shoulder were bruised; she suffered and continues to suffer great mental anguish and physical pain; she was permanently injured; she was internally injured; for all of which she claims damages aforesaid, hence this suit.

CAPELL, HOWARD & COBBS and J. B. Blackburn

J. B. Blackburn
Attorneys for Plaintiff

12-2-1904
 12-2-1904

[illegible]

Before we engaged with the idea of the "right time" to launch, we had to ask ourselves: What does "right time" mean in this context? Is it about market readiness, or is it about the readiness of our organization? We realized that the answer lay in the intersection of these two factors.

THE UNIVERSITY OF CHICAGO

1991, 2 years, then, no extra cost

THE UNIVERSITY OF CHICAGO

THE UNIVERSITY OF CHICAGO

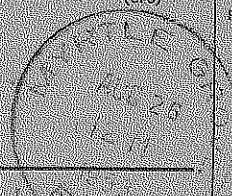
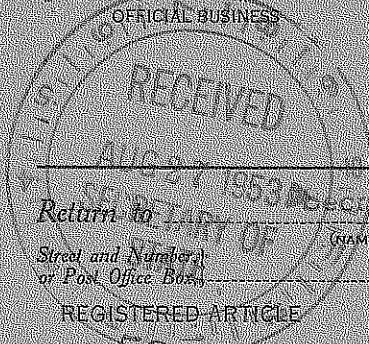
more money every day

Post Office Department

OFFICIAL BUSINESS

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

POSTMARK OF DELIVERING
OFFICE



Return to Secretary of State

Street and Number
or Post Office Box
Montgomery, Alabama

REGISTERED ARTICLE

No. 52693
INSURED PARCEL

MONTGOMERY,
ALABAMA.

Form 3811
Rev. 1-52

RETURN RECEIPT

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

1 Curtis Foster

(Signature or name of addressee)

2 DELIVER TO ADDRESSEE ONLY

(Signature of addressee's agent—Agent must write addressee's name on line ONE above)

Date of delivery _____, 19____