

December 3, 1969

TERRY L. LORD, a minor, suing by his next
friend and Father, OSCAR B. LORD,
Plaintiff

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

VS

HOMER BOYD STREHLE, Defendant

CASE NO. 9006

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

I, Mabel Amos, Secretary of State, hereby certify that on November 24, 1969
I sent by certified mail in an envelope addressed as follows:

"Homer Boyd Strehle
Star Route, Box 480
Pensacola, Florida 32502"

"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:

"Homer Boyd Strehle
Star Route, Box 480
Pensacola, Florida 32502"

You will take notice that on November 24, 1969 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: TERRY L. LORD, a minor, suing by his next friend and Father,
OSCAR B. LORD, Plaintiff VS HOMER BOYD STREHLE, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 9006 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 24th
day of November, 1969

Enclosure (1)

(Signed) Mabel S. 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 December 2, 1969 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Pensacola, Fl.
on 12/1/69

WITNESS MY HAND and the Great Seal of the State of Alabama this the 3rd day
of December, 1969


MABEL S. AMOS
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
CC: Honorable James E. Moore
108 Llewellyn Court
Mobile, Alabama 36608

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 9006

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~HOMER BOYD STREHLE~~.....

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.....

~~HOMER BOYD STREHLE~~..... Defendant.....

by TERRY L. LORD, a minor suing by his next friend and father, OSCAR B. LORD,.....

..... Plaintiff.....

Witness my hand this.....21st.....day of.....November..... 1969.....

Alise J. Duck..... Clerk

No.

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

TERRY L. LORD, a minor, suing)	IN THE CIRCUIT COURT OF
by his next friend and father,)	
OSCAR B. LORD,)	BALDWIN COUNTY, ALABAMA,
)	
Plaintiff,)	AT LAW.
)	
vs.)	
)	
HOMER BOYD STREHLE,)	
)	
Defendant.)	CASE NO. <u>9006 -</u>

COUNT ONE

The Plaintiff, a minor, suing by his next friend and father, OSCAR B. LORD, claims of the Defendant, the sum of Ten Thousand Dollars (\$10,000) damages, for that heretofore on to wit December 11, 1968, the Defendant so negligently operated a motor vehicle which he was driving on Elberta Dump Road, a public road in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, as to negligently cause the said vehicle which he was driving to run into, over, and against a motor bike on which the Plaintiff, Terry L. Lord, was at that time and place riding. Plaintiff avers that as a proximate and immediate consequence of the negligence of the Defendant as aforesaid, the Plaintiff was seriously injured, suffered a broken leg, bruises, cuts and internal injuries, and much pain and mental anguish, and was forced to undergo extensive and extended hospital and medical treatment for the said injuries, and was disabled for approximately seven (7) months; hence this suit.

COUNT TWO

The Plaintiff, a minor, suing by his father and next friend, claims of the Defendant the sum of Ten Thousand Dollars (\$10,000) damages, for that heretofore on to wit December 7, 1968, the Defendant did while operating a motor vehicle on the Elberta Dump Road, a public road located in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, did so recklessly and wantonly operate the said vehicle as to recklessly and wantonly cause the vehicle to run into, over or against a motor bike on which the said minor Plaintiff was then and there riding. Complainant

avers that as a proximate and immediate consequence of the recklessness and wantonness of the Defendant as aforesaid the Plaintiff suffered serious injuries including a broken leg, internal injuries, bruises and cuts, pain and mental anguish and was forced to undergo extensive and extended hospital and medical treatment for the said injuries, and was disabled for approximately seven (7) months; hence this suit.


Attorney for the Plaintiff

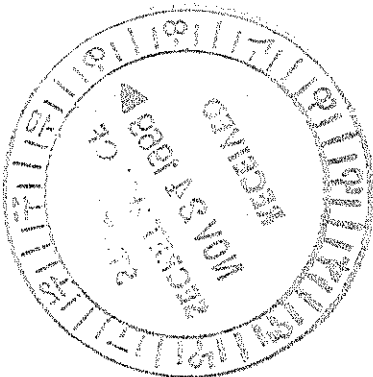
MOORE, MOORE, DOWNING AND LAYDEN
BY: James E. Moore, 920 Dauphin Street,
Mobile, Alabama

Defendant is a non-resident, residing at:
Star Rt. Box 480
Pensacola, Florida

DEMAND FOR JURY

Plaintiff demands trial by Jury.


Attorney for the Plaintiff




FILED

NOV 21 1969

ALICE J. [unclear] CLERK

covers that as a proximate and immediate consequence of the recklessness and wantonness of the Defendant as aforesaid the Plaintiff suffered serious injuries including a broken leg, internal injuries, bruises and cuts, pain and mental anguish and was forced to undergo extensive and extended hospital and medical treatment for the said injuries, and was disabled for approximately seven (7) months; hence this suit.



 Attorney for the Plaintiff

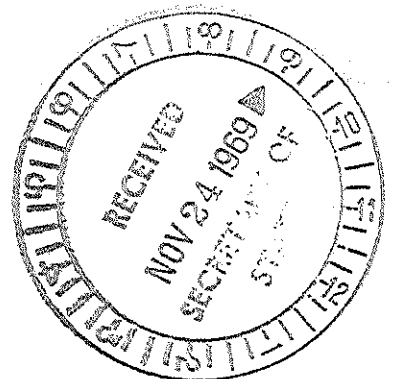
MOORE, MOORE, DOWLING AND LAYDEN
 BY: James E. Moore, 320 Dauphin Street,
 Mobile, Alabama

Defendant is a non-resident, residing at:
 Star Rt. Box 480
 Pensacola, Florida

DEMAND FOR JURY

Plaintiff demands trial by jury.


 Attorney for the Plaintiff



FILED

NOV 21 1969

WILLIAM J. MOORE

MOORE, MOORE, DOWNING & LAYDEN
LAWYERS

920 DAUPHIN STREET
P. O. BOX 4457
MOBILE, ALABAMA 36604

January 27, 1970

GEORGE J. MOORE
JAMES E. MOORE
MAURICE A. DOWNING
LIONEL L. LAYDEN

CHARLES H. ERWIN

CABLE ADDRESS: LAWYER
TEL. NO.: 432-5641

*Clerk, Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama*

*Re: Terry L. Lord, a minor, and Oscar B. Lord,
Plaintiffs vs. Homer Boyd Strehle, Circuit
Court of Baldwin County, Cases 9006 and 9007*

Dear Sir:

*I write to inform you that the judgment in both of the above cases has
been satisfied in full.*

I will appreciate your showing this in your records on the case.

Sincerely yours,


James E. Moore

JEM:bg

2024

TERRY L. LORD, a minor, suing)	IN THE CIRCUIT COURT OF
by his next friend and father,)	
OSCAR B. LORD,)	BALDWIN COUNTY, ALABAMA,
)	
Plaintiff,)	AT LAW.
)	
vs.)	
)	
HOMER BOYD STREHLE,)	
)	
Defendant)	CASE NO. <u>9006</u>

COUNT ONE

The Plaintiff, a minor, suing by his next friend and father, OSCAR B. LORD, claims of the Defendant, the sum of Ten Thousand Dollars (\$10,000) damages, for that heretofore on to wit December 11, 1968, the Defendant so negligently operated a motor vehicle which he was driving on Elberta Dump Road, a public road in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, as to negligently cause the said vehicle which he was driving to run into, over, and against a motor bike on which the Plaintiff, Terry L. Lord, was at that time and place riding. Plaintiff avers that as a proximate and immediate consequence of the negligence of the Defendant as aforesaid, the Plaintiff was seriously injured, suffered a broken leg, bruises, cuts and internal injuries, and much pain and mental anguish, and was forced to undergo extensive and extended hospital and medical treatment for the said injuries, and was disabled for approximately seven (7) months; hence this suit.

COUNT TWO

The Plaintiff, a minor, suing by his father and next friend, claims of the Defendant the sum of Ten Thousand Dollars (\$10,000) damages, for that heretofore on to wit December 7, 1968, the Defendant did while operating a motor vehicle on the Elberta Dump Road, a public road located in Baldwin County, Alabama, at a point on said road approximately two miles west of the intersection of said road with Highway 83, did so recklessly and wantonly operate the said vehicle as to recklessly and wantonly cause the vehicle to run into, over, or against a motor bike on which the said minor Plaintiff was then and there riding. Complainant

avers that as a proximate and immediate consequence of the recklessness and wantonness of the Defendant as aforesaid the Plaintiff suffered serious injuries including a broken leg, internal injuries, bruises and cuts, pain and mental anguish and was forced to undergo extensive and extended hospital and medical treatment for the said injuries, and was disabled for approximately seven (7) months; hence this suit.


Attorney for the Plaintiff

MOORE, MOORE, DOWNING AND LAYDEN
BY: James E. Moore, 920 Dauphin Street,
Mobile, Alabama

Defendant is a non-resident, residing at:
Star Rt. Box 480
Pensacola, Florida

DEMAND FOR JURY

Plaintiff demands trial by Jury.


Attorney for the Plaintiff

FILED

NOV 21 1969

ALICE J. EMMY CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9006

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon HOMER BOYD STREHLE

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.....

HOMER BOYD STREHLE..... Defendant.....

by TERRY L. LORD, a minor suing by his next friend and father, OSCAR B. LORD,

..... Plaintiff.....

Witness my hand this 21st day of November 1969.....

Alice J. Luck, Clerk

36/
11-24-69

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

TERRY L. LORD, a minor suing by.....

his next friend and father

OSCAR B. LORD

Plaintiffs

vs.

HOMER BOYD STREHLE

Defendants

SUMMONS AND COMPLAINT

Filed November 21..... 19.69..

M. S. Butler, Sheriff of Montgomery County, Alabama, Claim \$1.50 each for

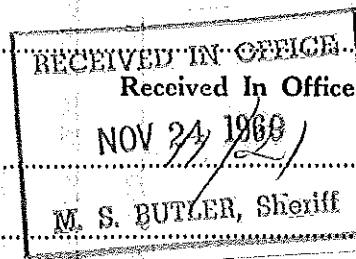
serving 1 process(es) and \$1.00travel expense on each of 1process(es) or a total of \$2.50

By: James E. Moore

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at



I have executed this summons

this 19.....

by leaving a copy with

Executed by serving 3 copies of
the within on Mable Amos
Secretary of State of The State of
Alabama.

[This the 24 day of Nov. 1969

Sheriff of Montgomery County

M. S. Butler,

By: W. L. Moore D. N.

Sheriff

Deputy Sheriff

TERRY L. LORD, a minor, suing)	IN THE CIRCUIT COURT OF
by his next friend and father,)	
OSCAR B. LORD,)	BALDWIN COUNTY, ALABAMA,
)	
Plaintiff,)	AT LAW.
)	
vs.)	
)	
HOMER BOYD STREHLE,)	
)	
Defendant.)	CASE NO. 9006

ANSWER

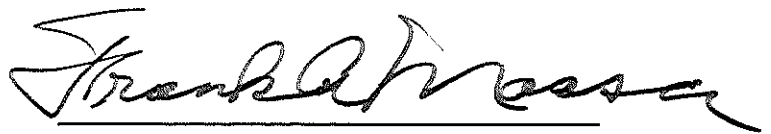
Comes the Defendant, by his attorney, and for answer to the Complaint filed in this cause and to each and every Count thereof, files the following separate and several answers:

ONE

Not Guilty.

TWO

The Defendant says that on the occasion complained of by the Plaintiff, and at that time and place, the Plaintiff was himself guilty of negligence which proximately contributed to his own injury.


Attorney for the Defendant

FILED

DEC 12 1969

ALICE J. DUCK CLERK
REGISTER