

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III  
WILLIAM L. HOWELL

May 11, 1970

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse,  
Bay Minnette, Alabama


Re: John Richard Sute vs John Wesley Carroll

Dear Mrs. Duck:

The defendant in the above styled matter was served with complaint and summons on February 14, 1970 and the plaintiff is eligible for a default judgment. Kindly bring the matter to the Judge's attention for purposes of entering a judgment by default. Kindly furnish me with a certificate of judgment. I will remit your charges for certificate of judgment upon receipt of same.

We ask that the judgment entered, be in the amount of \$200.70 instead of \$204.70.

Very truly yours,

  
William L. Howell

WLH:mp

NOTE: Judge says to please come in and prove damages - 5/14/70 Judgment was entered with a writ of inquiry.

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E. GRAHAM GIBBONS  
B. F. STOKES, III  
WILLIAM L. HOWELL

May 26, 1970

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA 36601

Mrs. Alice Duck, Clerk,  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minnette, Alabama

9117

Re: John Richard Sute vs John Wesley Carroll

Dear Mrs. Duck:

Judgment was entered in the above styled matter with a Writ of Inquiry. Attached find repair bills on this matter, which I feel will satisfy the judge for purposes of entering a judgment in the amount of \$200.70. Kindly bring it to his attention with regard to whether or not repair bills are sufficient for purposes of proving damages.

Thanking you in advance for your cooperation, and indulgence, I am,

Very truly yours,

  
William L. Howell

WLH:mp

Atch.

FILED

MAY 27 1970

ALICE J. DUCK

CLERK  
REGISTER



### ESTIMATE OF REPAIRS

### ESTIMATE OF REPAIRS

[illegible]

FORA & NOVICK PROS., OY. LAMONA CITY

\$ \_\_\_\_\_ insurance deductible  
 \_\_\_\_\_ depreciation  
 \_\_\_\_\_ work not covered by insurance

GRAND TOTAL \$\_\_\_\_\_

By:

DAY PHONE 943-4011  
NIGHT PHONE 943-3875  
OR CALL CAR NO. 12

PAINT AND BODY . GLASS . UPHOLSTERY

225 EAST LAUREL AVENUE

FOLEY, ALABAMA

NAME John R Leete		ADDRESS Reef Shoals Ala		PHONE	DATE 9-9-69
YEAR 1969	MAKE VW Beetle	MODEL	LICENSE NO.	SPEEDOMETER	BODY NO.
INSURANCE CARRIER		ADJUSTER		PHONE	SER. NO.
					PAINT NO. LSDR

OPERATIONS	SUBLET	PARTS	LABOR
Replace rear bumper		2620 ✓	12
" " " braces		850	
" " body panel			
Include R & L 2-fender engine		1705 ✓	10
align & adjust engine panels			10
" deck lid - R & L fender			15
regulate miller		1150 ✓	14
Refresh as req'd	2500		
Frame repair, align	7500 ✓		
			13.

The above estimate, based on our inspection, does not cover additional parts or labor which may be required after work has been opened up. Occasionally, after work has started, worn, broken or damaged parts are discovered which are not evident on first inspection. Quotations on parts and labor are current and subject to change.

ESTIMATE MADE BY: F. J. Lewis

**TOTALS**

WRECKER  
SERVICE

TAX

TOTAL OF  
ESTIMATE

SIGNED:

DATE \_\_\_\_\_

TERMS: STRICTLY CASH UNLESS ARRANGEMENTS MADE

JOHN RICHARD SUTE ) IN THE CIRCUIT COURT OF  
Plaintiff ) BALDWIN COUNTY, ALABAMA  
VS )  
JOHN WESLEY CARROLL ) AT LAW  
Defendant ) CASE NO. 9117

MOTION FOR DEFAULT JUDGMENT

Comes now the plaintiff in the above styled cause and shows and represents unto your honor, that heretofore on, to-wit, February 14, 1970, the defendant in the above styled matter was served with process, and since that date has failed or refused to plea, answer or demurr to same. Wherefore, premises considered, the plaintiff prays judgment by default be entered in favor of the plaintiff and against the defendant, in the amount of \$200.70.

GIBBONS & STOKES

BY: William L. Howell  
William L. Howell  
Attorney for Plaintiff

FILED  
MAY 13 1970  
ALICE J. DUCK CLERK  
REGISTER

JOHN RICHARD SUTE	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
VS	)	AT LAW
JOHN WESLEY CARROLL	)	Case No. <u>9117</u>
Defendant	)	

Plaintiff claims of the defendant \$204.70 damages for that heretofore and on, to-wit, September 5, 1969 on U. S. Highway 98 near Daphne, Alabama, said U. S. Highway 90 being a public street in Baldwin County, Alabama, the defendant did so negligently operate a motor vehicle as to cause or allow it to run into and against the plaintiff's motor vehicle which was being operated at said time and place and as a proximate result and consequence of the said negligence of the defendant, plaintiff's motor vehicle was smashed, bent, broken and otherwise damaged and plaintiff lost the use of said motor vehicle, for all of which damages plaintiff sues and demands judgment.

GIBBONS & STOKES

By: B. F. Stokes  
Attorneys for Plaintiff

Serve the defendant at Route 1, Box 221A, Daphne, Alabama

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9117

TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John Wesley Carroll

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.....

John Wesley Carroll

.., Defendant.....

by John Richard Sute

....., Plaintiff.....

Witness my hand this 11th day of February 1970.

Alice J. Luck Clerk

E42-14-70

No. 9117

Page.....

**THE STATE OF ALABAMA**

**BALDWIN COUNTY**

**CIRCUIT COURT**

JOHN RICHARD SUTE

Plaintiffs

vs.

JOHN WESLEY CARROLL

Defendants

**SUMMONS AND COMPLAINT**

Filed Feb. 11, 1970

Alice J. Duck Clerk

Gibbons & Stokes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

February 11 1970

Sheriff

I have executed this summons

this FEB 14 1970  
by leaving a copy with

John W. Carroll

Sheriff claims  
miles at  
\$  
TAYLOR WILKINS, Sheriff  
DUCK  
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

Moore Printing Co. Bay Minette, Ala.

IN Spanish Fort, Ala