

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Willie D. Dixon to appear within thirty days from the service of this Writ in the Circuit Court to be held for said county at the place of holding same, then and there to answer the Complaint of Glenda Faye Martin.

Witness my hand this 22nd day of June, 1970.

Alice J. Dyer
Clerk

GLENDAY FAYE MARTIN,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
vs.	X	BALDWIN COUNTY, ALABAMA
WILLIE D. DIXON,	X	
		AT LAW
Defendant.	X	9349

The Plaintiff claims of the Defendant the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit, the 26th day of November, 1969, at a point on U. S. Highway 90 approximately 150 feet East of Palmer's Restaurant near Spanish Fort in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to and being driven by the Plaintiff and as a direct and proximate result of said negligence the Plaintiff's automobile was a total loss and the Plaintiff received severe personal injuries in that she received a fracture of the sternum, a compression fracture of her fourth thoracic vertebra and a cardiac contusion. She incurred large hospital and medical bills and experienced much mental and physical pain and

suffering, she was totally disabled for approximately three weeks and will suffer a permanent partial disability to her body as a whole, she lost time from her employment, all of such damages being the direct and proximate result of the negligence of the Defendant in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

The Plaintiff respectfully demands a trial of this cause by a jury.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

Defendant may be served at

824 LaFargue
Mobile, Alabama

FILED

JUN 22 1970

ALICE J. DUCK CLERK
REGISTER

W/ the sum paid for
the Plaintiff and
paid the amount of
\$10,000

James
Arthur D. Chason

Received 2nd day of June 1970
and on 1 day of July 1970
I served a copy of the within
on Mary Martin
By service on
Ray D. Bridges
Sheriff
W. R. Richardson

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9349 8208

GLENDAY FAYE MARTIN,
Plaintiff,
vs.
WILLIE D. DIXON,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

BY
JUN 21 0 38 PM '70
SHERIFF DEPT
HONOLULU, ALA.

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. BOX 120
BAY MINETTE, ALABAMA

GIBBONS, STOKES & CLARK

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

E. GRAHAM GIBBONS
BEN STOKES
ROBERT F. CLARK

May 18, 1972

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

Mrs. Eunice Blackmon, Clerk
Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Glenda F. Martin vs Willie D. Dixon Case No. 9349

Dear Mrs. Blackmon:

Please forward the attached affidavit for garnishment to the Sheriff of Mobile County for service on the garnishee and defendant.

Sincerely,


Robert F. Clark

RFC:cm

Enc.

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

C.C. LAW 12-2M-6-69

9349 1/2

THE STATE OF ALABAMA }
MOBILE-COUNTY
BALDWIN COUNTY

CIRCUIT COURT

Notary Public

Personally appeared before me, ~~John E. Mandeville, Clerk of the Circuit Court in and for Mobile County~~
and State aforesaid Ben Stokes

who being duly sworn, on oath says, that on the 12th day of April, 1971
Baldwin
in the Circuit Court of Mobile County, in Case No. 9349 The Plaintiff

Glenda F. Martin

recovered a judgment against Willie D. Dixon

..... the Defendant, whose address
is c/o A. L. Sandlin Lumber Co., Inc.

for the sum of \$10,000.00

Dollars, besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect;
that A. L. Sandlin Lumber Co., Inc.

.....
whose address is 709 Western Dr., Mobile, Alabama

is supposed to be indebted to or have effects of the said Willie D. Dixon

in its possession or under its
control, and that he believes process of Garnishment against the said A. L. Sandlin Lumber Co.
..... Inc.

is necessary to obtain satisfaction of said Judgment.

Ben Stokes

Sworn to and subscribed this 18th
day of May A.D., 1972

Mrs. Brenda Gayle Walker
Notary Public Clerk-

FILED

MAY 19 1972

EUNICE B. BLACKMON CIRCUIT CLERK

No. 9349

CIRCUIT COURT

Glenda F. Martin

vs.

Willie D. Dixon

**AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT**

Filed in Office,

19

Clerk.

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

CC LAW 12-2M-6-69

THE STATE OF ALABAMA }
MOBILE COUNTY
BALDWIN COUNTY

CIRCUIT COURT

Notary Public

Personally appeared before me, John E. Mandeville, Clerk of the Circuit Court in and for Mobile County
and State aforesaid Ben Stokes

who being duly sworn, on oath says, that on the 12th day of April, 1971
Baldwin 9349
in the Circuit Court of Mobile County, in Case No. The Plaintiff

Glenda F. Martin

recovered a judgment against Willie D. Dixon

the Defendant, whose address
is c/o A. L. Sandlin Lumber Co., Inc.

for the sum of \$10,000.00

Dollars, besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect;
that A. L. Sandlin Lumber Co., Inc.

709 Western Dr., Mobile, Alabama
whose address is

is supposed to be indebted to or have effects of the said Willie D. Dixon

in its possession or under its
control, and that he believes process of Garnishment against the said A. L. Snadlin Lumber Co.
Inc.

is necessary to obtain satisfaction of said Judgment.

Sworn to and subscribed this 18th
day of May A.D., 1972

Notary Public Clerk

No. 9349

CIRCUIT COURT

Glenda F. Martin

vs.

Willie D. Dixon

AFFIDAVIT FOR GARNISHMENT
ON JUDGMENT

Filed in Office,

19

Clerk.