

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
BEN STOKES
ROBERT F. CLARK
JOHN T. BALLARD

May 24, 1971

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

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

Re: William D. Hargroder vs
Melvin Lowe

9801

Dear Mrs. Blackmon:

Please issue an alias complaint and summons to the defendant
in the above styled matter at Route 1, Box 272-C, Daphne, Alabama.

Thanking you in advance for your cooperation in this matter,
I remain

Sincerely,


Robert F. Clark

RFC:cm

WILLIAM D. HARGRODER,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs)
MELVIN LOWE,)
Defendant.) CASE NO. 9801

Plaintiff claims of the defendant One Thousand Twenty-Four Dollars and Six Cents (\$1,024.06) as damages for that heretofore on, to-wit, August 21, 1970, the plaintiff's automobile was being operated along and upon U. S. Highway 31, which is a public highway in the city of Spanish Fort, Baldwin County, Alabama at or near its intersection with Alternate U. S. 90 and the defendant did then and there so negligently operate another vehicle so as to allow same to run into, upon and against the plaintiff's said automobile and as a proximate consequence thereof, the plaintiff's said automobile was greatly bent, smashed, broken, and otherwise rendered less valuable. Hence this suit.

GIBBONS & STOKES

By

Robert F. Clark
Robert F. Clark
Attorney for Plaintiff
P. O. Box 293
Mobile, Alabama

Serve the defendant at:

Route 1, Box 272-C
Daphne, Alabama

FILED
APR 23 1971
EUNICE B. BLACKMON CIRCUIT CLERK

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

} No 9801.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MELVIN LOWE
.....
.....
.....

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.....

MELVIN LOWE .., Defendant.....

by WILLIAM D. HARGRODER
..... Plaintiff.....

Witness my hand this 23rd day of April 1971

Ernie B. Blackman, Clerk

No.....

Page.....

THE 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

WILLIAM D. HARGRODER,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs)
MELVIN LOWE,)
Defendant.) CASE NO. _____

Plaintiff claims of the defendant One Thousand Twenty-Four Dollars and Six Cents (\$1,024.06) as damages for that heretofore on, to-wit, August 21, 1970, the plaintiff's automobile was being operated along and upon U. S. Highway 31, which is a public highway in the city of Spanish Fort, Baldwin County, Alabama at or near its intersection with Alternate U. S. 90 and the defendant did then and there so negligently operate another vehicle so as to allow same to run into, upon and against the plaintiff's said automobile and as a proximate consequence thereof, the plaintiff's said automobile was greatly bent, smashed, broken, and otherwise rendered less valuable. Hence this suit.

GIBBONS & STOKES

By Robert F. Clark
Robert F. Clark
Attorney for Plaintiff
P. O. Box 293
Mobile, Alabama

Serve the defendant at:

Route 1, Box 272-C
Daphne, Alabama

FILED

APR 23 1971

EUNICE B. BLACKMON CIRCUIT CLERK

WILLIAM D. HARGRODER,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
vs)
MELVIN LOWE,)
Defendant.) CASE NO. 9801

Plaintiff claims of the defendant One Thousand Twenty-Four Dollars and Six Cents (\$1,024.06) as damages for that heretofore on, to-wit, August 21, 1970, the plaintiff's automobile was being operated along and upon U. S. Highway 31, which is a public highway in the city of Spanish Fort, Baldwin County, Alabama at or near its intersection with Alternate U. S. 90 and the defendant did then and there so negligently operate another vehicle so as to allow same to run into, upon and against the plaintiff's said automobile and as a proximate consequence thereof, the plaintiff's said automobile was greatly bent, smashed, broken, and otherwise rendered less valuable. Hence this suit.

GIBBONS & STOKES

By Robert F. Clark
Robert F. Clark
Attorney for Plaintiff
P. O. Box 293
Mobile, Alabama

Serve the defendant at:

Route 1, Box 272-C
Daphne, Alabama

FILED

APR 23 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Returned 30 day of Aug 19 71

Not found in my county after diligent search and inquiry.

By Taylor Wilkins, Sheriff
Fred S. [unclear] Deputy Sheriff

Sheriff claims _____ miles at
Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff

BY _____ DEPUTY SHERIFF

By TAYLOR WILKINS, Sheriff D. S.

Received 19 ~~day~~ of Aug 19 71
and on _____ day of _____ 19 ____
I served a copy of the writ in SDC
on William Rouse

By service on _____

[Faint, illegible text, possibly a stamp or secondary receipt]

[Faint, illegible text, possibly a stamp or secondary receipt]

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No 9801.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MELVIN LOWE

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.....

MELVIN LOWE
..... Defendant.....

by WILLIAM D. HARGRODER
..... Plaintiff.....

Witness my hand this 23rd day of April 1971

Ernie B. Blackman Clerk

MOVED to
MISSISSIPPI
W. Crook, 4-24-71

No. 9801..... Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

.....WILLIAM D. HARGRODER.....

Plaintiffs

vs.

.....MELVIN LOWE.....

Defendants

SUMMONS AND COMPLAINT

Filed April 23,..... 1971..

.....Eunice B. Blackmon..... Clerk

Gibbons & Stokes
..... P. O. Box 293 - MOBILE, ALA.
Plaintiff's Attorney

..... Defendant's Attorney

AUG 19 1971

JAYLOR WILKINS
SHERIFF

Defendant lives at
Rt 1, Box 272-C
Daphne
.....
Received In Office

..... April 23 1971

..... *Jaylor Wilkins* Sheriff

I have executed this summons
this
by leaving a copy with

MAY 25 1971
Melvin Lowe
..... day of
..... Sheriff claims miles at
..... en Court per mile Total \$
Jaylor Wilkins Sheriff
..... DEPUTY SHERIFF
.....
APR 26 1971
..... day of
..... Sheriff
Jaylor Wilkins Sheriff
W. Crook
..... Sheriff
..... Deputy Sheriff

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
BEN STOKES
WILLIAM L. HOWELL
ROBERT F. CLARK
JOHN T. BALLARD

April 22, 1971

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

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

Re: William D. Hargroder vs
Melvin Lowe

Dear Mrs. Blackmon:

Please file the enclosed suit with regard to the above styled matter.

Thanking you in advance for your cooperation in this matter, I remain

Sincerely,


Robert F. Clark

RFC:cm

Enc.

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
BEN STOKES
ROBERT F. CLARK
JOHN T. BALLARD

August 16, 1971

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

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

Re: William D. Hargroder vs
Melvin Lowe
Case No. 9801

Dear Mrs. Blackmon:

Please issue an alias complaint and summons against the defendant with regard to the above styled matter.

The following directions may assist in locating the defendant:

Proceed on Highway 31 in an easterly direction from Spanish Fort, Alabama, pass the intersection of Truck Route, U. S. Highway 90 and proceed about one and one half (1 1/2) miles. Turn left on red clay road and travel approximately four (4) blocks. Subject lives in a frame house on the right.

Thanking you in advance for your cooperation, I remain

Sincerely,


Robert F. Clark

RFC:cm

This paper is for Melvin Lowe, Sr. The above directions are to Melvin Lowe Jr.'s house. I know both subjects and Melvin Lowe Sr. lives in Shreveport, La. and he is the one that was involved in the wreck referred to in the complaint.

Fred Seibert D.S.

BK
to Stokes

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
BEN STOKES
ROBERT F. CLARK
JOHN T. BALLARD

September 30, 1971

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

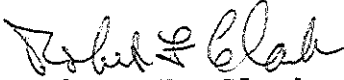
Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: William D. Hargroder vs
Melvin Lowe
Case No. 9801

Dear Mrs. Blackmon:

Please non-suit the above styled matter on motion
of the plaintiff.

Sincerely,


Robert F. Clark

RFC:cm