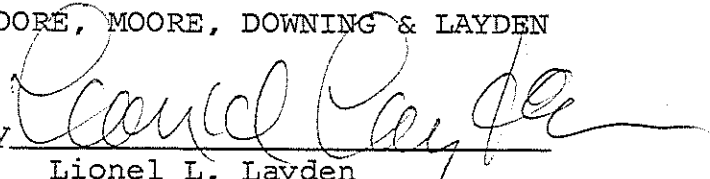


JANIE O. GILMORE,)	IN THE CIRCUIT COURT
Plaintiff,)	OF BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
JAMES MCGILL,)	
Defendant.)	CASE NO. <u>9815</u>

The Plaintiff claims of the Defendant the sum of TEN THOUSAND AND NO/100 (\$10,000.00) DOLLARS damages for that heretofore on, to-wit: January 17, 1971, the Defendant so negligently operated the motor vehicle he was then and there driving on Alabama Highway 16 between Country Road 55 and Hinote Road, said highway and roads being public roads in the County of Baldwin, State of Alabama, so as to cause or allow the said motor vehicle to run into, over, upon or against the motor vehicle in which the Plaintiff was a passenger, which automobile was also on said Alabama Highway 16 between Country Road 55 and Hinote Road at said place, and Plaintiff alleges that as a direct and proximate result of the said negligence of the Defendant, the Plaintiff was injured as follows:

Plaintiff was badly bruised, strained and sprained; Plaintiff suffered injuries to her finger and hand; she suffered a contusion of the right forehead, and strain of the neck and low back; Plaintiff alleges that she was permanently injured; Plaintiff was caused to suffer pain; Plaintiff was caused to expend sums of money on doctor and medical expenses, all to her damage, hence this suit.

MOORE, MOORE, DOWNING & LAYDEN

By 
Lionel L. Layden
Attorneys for Plaintiff

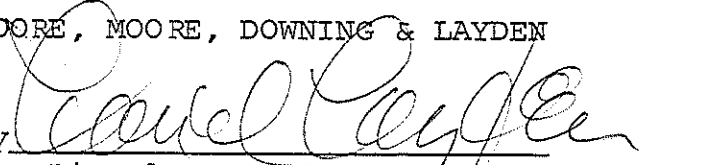
Plaintiff respectfully demands a trial by jury.

FILED

APR 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK
Please serve Defendant
at: Route 1, Summerdale, Alabama

MOORE, MOORE, DOWNING & LAYDEN

By 
Lionel L. Layden
Attorneys for Plaintiff
920 Dauphin Street
Mobile, Alabama

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9815

TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES MCGILL

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

JAMES MCGILL Defendant

by JANIE O. GILMORE

Plaintiff

Witness my hand this 30th day of April 1971

Eunice B. Blackmon Clerk

L. Dale

No. 9815

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

JANIE O. GILMORE

Plaintiffs

vs.

JAMES MCGILL

Defendants

SUMMONS AND COMPLAINT

Filed April 30, 1971

Eunice B. Blackmon Clerk

Moore, Moore, Downing & Layden

Plaintiff's Attorney

Defendant's Attorney

AUG 27 1971

Defendant ^{James L. Gilmore}
% Robert L. Bernier Co.
R'dale

Received In Office

May 4 1971

Waylaw Wilkins Sheriff

I have executed this summons

this 7 28 1971

by leaving a copy with

BR

James McGill

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS Sheriff

BY H. J. Blackmon DEPUTY SHERIFF

Returned to county after diligent search and
Not found in county
June 11 1971
Taylor Wilkins Sheriff
H. J. Blackmon Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

some R. Dale

JANIE O. GILMORE,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY,
VS.	:	ALABAMA
JAMES McGILL,	:	AT LAW
Defendant.	:	CASE NO. 9815

P L E A

Comes now the Defendant, JAMES McGILL, in the above styled cause, and for answer to the Complaint and to each and every count thereof, says:

1. Not guilty.

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Defendant.

By: Brook D. Holmes
BROOK G. HOLMES

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 3 day
of Aug., 1971, served a copy of the
foregoing pleading on counsel for all parties to this
proceeding, by mailing the same by United States mail,
properly addressed, and first class postage prepaid.

Brook D. Holmes

FILED

AUG 4 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

MOORE, MOORE, DOWNING & LAYDEN

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

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

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

July 23, 1971

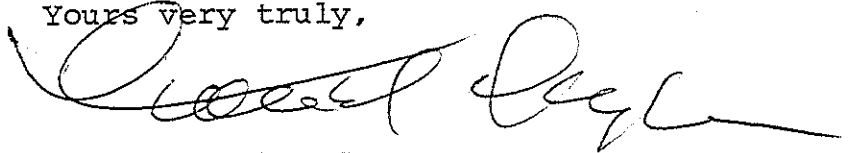
Eunice B. Blackmon, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama 36507

Re: GILMORE, ET AL VS.
JAMES MCGILL
Case nos: 9815, 9816 & 9817

Dear Mrs. Blackmon:

The new address of James McGill is: Robert L. Berner Company,
Robertsdale, Alabama. Please issue an alias summons so that he
can be served with the complaint.

Yours very truly,



LIONEL L. LAYDEN

LLL/jh