

95324
4/20
GWEN BUSH HAWKINS, a minor who sues
by her mother and next friend, LEILA
B. BUSH,

Plaintiff,

VS

ALICE GAYLE THOMAS, G. C. HARRORD,
A, B, C, the persons, firms or corpora-
tions who were the owners or operators
of that certain motor vehicle which
collided with the motor vehicle the
Plaintiff was riding in as a guest
passenger on to-wit: March 14, 1970
and whose names are otherwise unknown
but will be added by Amendment when
ascertained, jointly and individually,

Defendants.

* IN THE COURT OF GENERAL
* SESSIONS OF MOBILE COUNTY,
* ALABAMA

CASE NO. 9820

COUNT ONE

The Plaintiff claims of the Defendants the sum of THREE HUNDRED
AND NO/100 (\$300.00) DOLLARS, as damages for that heretofore and on,
to-wit: March 14, 1970, the automobile the Plaintiff was riding in
as a guest passenger, was being operated on West Gulf Beach Boulevard
at or near its intersection with West Second Street in the City of
Gulf Shores, Baldwin County, Alabama, and the Defendants did then and there-
so negligently operate a motor vehicle as to cause the same to run into,
upon and against the automobile the Plaintiff was riding in as a
proximate consequence of the negligence of the Defendants, as afore-
said, Plaintiff was injured as follows: She received contusions of the
muscles of her back and abdomen; she was made sick, sore and lame;
hence this suit.

FOREMAN, BROWN & HUDGENS
Attorneys for the Plaintiff

By J. George Whitfield
J. George Whitfield

Serve Defendants:

Alice Gayle Thomas
711 Fairhope Ave.
Fairhope, Alabama

G. C. Harrord
Route 2 Box 125
Fairhope, Alabama

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS
COURTROOM "B" FIRST FLOORThe State of Alabama,
MOBILE COUNTY

} TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Alice Gayle Thomas, G.C. Harrord, etc.

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 20 day of April, 19 71 at the hour of 9:00 A.M., then and there to answer a complaint of Gwen Bush Hawkins, etc.

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this 15 day of March, 19 71

[Signature]
Clerk of the Court of General Sessions of Mobile County.

Cause of Action _____

COMPLAINT AND SUMMONS

Atty. for Plaintiff: Foreman, Brown & Hudgens

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 95324

Ret. April 20, 1971

Gwen Bush Hawkins, a minor who sues
by her mother and next friend, Leila
VS. B. Bush
Alice Gayle Thomas, G. C. Harrord, etc., et al
711 Fairhope Ave. Rt. 2, Box 125
Fairhope Fairhope, Ala.

Continued To

Executed by Service on

Defendant

This day, 19

Sheriff of Mobile County

By Deputy Sheriff

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS
COURTROOM "B" FIRST FLOOR

The State of Alabama,
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Alice Gorda Thomas, G. G. Harford, etc.

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 20 day of April, 1971 at the hour of 9:00 A.M., then and there to answer a complaint of Chas Bush Thomas, etc.

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this 20 day of April, 1971

Clerk of the Court of General Sessions of Mobile County.

Cause of Action

COMPLAINT AND SUMMONS

Atty. for Plaintiff: Foxman, Brown & Hudgens

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

No. 95321

Ret. April 20, 1971

Owen Bush Watkins, a minor who was
by her mother and next friend, Lelia
VS. B. Bush
Alice Gayle Thomas, G. O. Harford, etc., et al
711 Fairhope Ave. Rt. 2, Box 1/5
Fairhope Fairhope, Ala.

Continued To

MAR 18 1971

TAYLOR WILKINS
SHERIFF

CR

Executed by Service on

Alice Gayle Thomas 3-22-71
G. O. Harford 3-22-71 Defendant

This 22 day of April, 1971.

Sheriff of Mobile County

By

Deputy Sheriff

REC'D SHERIFF DEP
MOBILE COUNTY, ALA

MAR 15 2 26 PM '71

BY

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 2 PROCESS(ES) AND 70
TRAVEL EXPENSE ON EACH OF \$ $7.00 + 7.00$
PROCESS(ES) OR A TOTAL OF \$ 17.00

1 VOL

68 PAGE 598

95324
GWEN BUSH HAWKINS, a minor who sues) IN THE COURT OF GENERAL
by her mother and next friend, LEILA)
B. BUSH,) SESSIONS OF MOBILE
Plaintiff,) COUNTY, ALABAMA

vs.)

ALICE GAYLE THOMAS, G. C. HARRORD,) CASE NO. 95324
A, B, C, the persons, firms or corpora-
tions who were the owners or operators)
of that certain motor vehicle which)
collided with the motor vehicle the)
Plaintiff was riding in as a guest)
passenger on to-wit: March 14, 1970,)
and whose names are other wise unknown)
but will be added by amendment when)
ascertained, jointly and individually,)
Defendants.)

Comes now the defendant, ALICE GAYLE THOMAS, in the
above styled cause by this special appearance and as grounds
for abating this cause of action, assigns the following
grounds, separately and severally.

ONE

That the defendant is a minor, age seventeen years,
and that there has been no guardian ad litem appointed to
defend this minor in this cause as required under Title 7,
Section 102, of the Code of Alabama (1940).

TWO

That the defendants, ALICE GAYLE THOMAS and
G. C. HARRORD, are now, were when this cause of action arose,
and were when this action was instituted, bonafide residents
of Baldwin County, Alabama, and that no parties have been
added by amendment as A, B, C, the persons, firms or corpora-
tions; that no parties defendant have been named in the com-
plaint in this matter who are residents of Mobile County,
Alabama, and that under Title 7, Section 54, of the Code of
Alabama (1940), this Honorable Court of General Sessions of
Mobile County, Alabama, is without jurisdiction to try this
suit.

COURT OF GENERAL
SESSION

MAR 31 12 51 PM '71

WHEREFORE, the defendants, ALICE GAYLE THOMAS and G. C. HARRORD, pray that this action may be abated in this Court.

Alice Gayle Thomas
ALICE GAYLE THOMAS

STATE OF ALABAMA

BALDWIN COUNTY

Before me, a Notary Public in and for said County in said State, personally appeared ALICE GAYLE THOMAS, who, being by me first duly sworn, says that the facts set forth in the foregoing plea are true and correct.

Alice Gayle Thomas
ALICE GAYLE THOMAS

Subscribed and sworn to before

me on this the 29th day of

March, 1971.

Daniel A. Benton
Notary Public, Baldwin County, Alabama

Daniel A. Benton
DANIEL A. BENTON, Attorney for
Defendant

OF COUNSEL:

RICKARBY & BENTON
Fairhope, Alabama

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the defendant in the foregoing matter, that a copy of this pleading by defendant of the instant case, together with a copy of summons and complaint with adequate postage paid thereon, has been properly delivered.

This 29th day of March, 19 71

Daniel A. Benton
Attorney for defendant
P. O. Box 471, Fairhope, Ala. 36532

VOL

68 PAGE 600

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B
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6

GWEN BUSH HAWKINS, a minor who :: IN THE COURT OF GENERAL
sues by her mother and next
friend, LEILA B. BUSH,

Plaintiff, :: SESSIONS OF MOBILE COUNTY,

VS:

:: ALABAMA

ALICE GAYLE THOMAS, G. C.
HARRORD, ET AL,

Defendants. :: CASE NO. 9 5 3 2 4

PLEA IN ABATEMENT

Comes now G. C. Harrord and appearing specially and only for the purpose of filing this Plea in Abatement respectfully moves the court to abate the cause of action filed in this court, which cause of action was heretofore filed in said court and service of process was had upon G. C. Harrord as a party defendant in the said cause, and as grounds therefor sets down and assigns the following, separately and severally:

1. It affirmatively appears from the face of the complaint that this is an action ex delicto and that the act or omission complained of occurred in Baldwin County, Alabama. It also affirmatively appears from the face of the pleading filed by the plaintiff in this cause that the defendants both reside in Baldwin County.

2. It affirmatively appears from the face of the pleading filed by the plaintiff for the reasons set out in paragraph 1 that there is improper venue as set forth in Title 7, Section 54, which requires "all other personal actions, if the defendant or one of the defendants has within the state a permanent residence, may be brought in the county of such residence, or in the county in which the act or omission complained of may have been done or may have occurred."

COURT OF GENERAL
SESSION

APR 5 3 22 PM '71

VOL 68 PAGE 601

WHEREFORE, the premises considered, for the reasons hereinabove assigned, separately and severally, your movant respectfully moves this court to abate this action filed heretofore in the Court of General Sessions of Mobile County, Alabama, and that this court transfer such action to a court of competent jurisdiction, which as appears from the face of the pleadings would be in Baldwin County, Alabama.

COLLINS, GALLOWAY & MURPHY

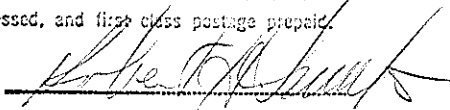
By: 

ROBERT H. SMITH

ATTORNEYS FOR DEFENDANT G. C. HARRORD

CERTIFICATE OF SERVICE


I do hereby certify that I have on this 8th
day of April, 19 44, served a copy of
the foregoing pleading on counsel for all
parties to this proceeding by mailing the
same by United States Mail, properly ad-
dressed, and first class postage prepaid.



STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me the undersigned authority in and for said State and County, personally appeared Robert H. Smith, who, known to me and being by me first duly sworn, does depose on oath and say that he is one of the attorneys for G. C. Harrord a defendant in the above styled cause and as such, is authorized to make this affidavit and to file this special and limited appearance in this court on his behalf; that he is informed and believes and upon such information and belief avers that the matters and facts set forth in the above and foregoing Plea in Abatement are true and correct.


Robert H. Smith

Sworn to and subscribed before me on this the 8th
day of April, 1971.


Notary Public, Mobile County, Alabama

GWEN BUSH HAWKINS, a minor who sues
by her mother and next friend, LEBILA
B. BUSH,

Plaintiff,

vs.

ALICE GAYLE THOMAS, G. C. HARRORD,
A, B, C, the persons, firms or corpora-
tions who were the owners or operators)
of that certain motor vehicle which
collided with the motor vehicle the
Plaintiff was riding in as a guest
passenger on to-wit: March 14, 1970,
and whose names are other wise unknown
but will be added by amendment when
ascertained, jointly and individually,

Defendants.

) IN THE COURT OF GENERAL
) SESSIONS OF MOBILE
) COUNTY, ALABAMA

)

) CASE NO. 95324

)

)

)

Comes now the defendant, ALICE GAYLE THOMAS, in the
above styled cause by this special appearance and as grounds
for abating this cause of action, assigns the following
grounds, separately and severally.

ONE

That the defendant is a minor, age seventeen years,
and that there has been no guardian ad litem appointed to
defend this minor in this cause as required under Title 7,
Section 102, of the Code of Alabama (1940).

TWO

That the defendants, ALICE GAYLE THOMAS and
G. C. HARRORD, are now, were when this cause of action arose,
and were when this action was instituted, bonafide residents
of Baldwin County, Alabama, and that no parties have been
added by amendment as A, B, C, the persons, firms or corpora-
tions; that no parties defendant have been named in the com-
plaint in this matter who are residents of Mobile County,
Alabama, and that under Title 7, Section 54, of the Code of
Alabama (1940), this Honorable Court of General Sessions of
Mobile County, Alabama, is without jurisdiction to try this
suit.

WHEREFORE, the defendants, ALICE GAYLE THOMAS and G. C. HARRORD, pray that this action may be abated in this Court.

Alice Gayle Thomas
ALICE GAYLE THOMAS

STATE OF ALABAMA

BALDWIN COUNTY

Before me, a Notary Public in and for said County in said State, personally appeared ALICE GAYLE THOMAS, who, being by me first duly sworn, says that the facts set forth in the foregoing plea are true and correct.

Alice Gayle Thomas
ALICE GAYLE THOMAS

Subscribed and sworn to before me on this the 29th day of March, 1971.

Daniel A. Benton
Notary Public, Baldwin County, Alabama

Daniel A. Benton
DANIEL A. BENTON, Attorney for Defendant

OF COUNSEL:

RICKARBY & BENTON
Fairhope, Alabama

~~CERTIFICATE OF SERVICE~~

~~This is to certify that I have served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in an envelope with adequate postage prepaid thereon and properly addressed.~~

~~This _____ day of _____, 19____~~

~~Attorney for
P. O. Box 471, Fairhope, Ala. 36532~~

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 95322

DEANNA TINDAL, a minor who sues by her
mother and next friend, MRS. L. V. TINDAL
Plaintiff,

VS

ALICE GAYLE THOMAS, C. G. HARRORD, A,B,C,
the persons, firms or corporations who
were the owners or operators of that
certain motor vehicle which collided with
the motor vehicle the Plaintiff was riding
in as a guest passenger on to-wit: March 14,
1970 and whose names are otherwise unknown
but will be added by Amendment when
ascertained, jointly and individually
Defendants

Amount of Claim: \$200.00

(Filed: March 12, 1971)
(Summons Issued: March 15, 1971)
(Returnable: April 20, 1971)
(Service Had: March 22, 1971)
(Cause of Action: Accident and Damages)
(Attorney for Plaintiff: Foreman, Brown & Hudgen)
(Attorney for Defendant: Riskarby, & Benton & Collins, Galloway)
()
()
()

March 31, 1971 - Defendant's Plea in Abatement filed (Alice G. Thomas)
April 8, 1971 - Defendant's , G. G. Harrold, Plea in Abatement filed
April 20, 1971 - Pleas confessed by Plaintiff
April 20, 1971 - CAUSE TRANSFERRED TO BALDWIN COUNTY CIRCUIT COURT.



I hereby certify that the foregoing is a true and correct copy of the
above styled cause, as it appears on record and in the files of The Court of
General Sessions of Mobile County, Alabama.

Witness my hand this the 28 day of April, 1971.



Clerk of The Court of General
Sessions of Mobile County
Alabama.

COST BILL

FOREMAN, BROWN & HUDGENS
ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.

DEANNA TINDAL, a minor who sues by her mother and next friend,

Plaintiff Mrs. L. V. Tindal

ALICE GAYLE THOMAS, C. G. HARRORD, ETC.,

Defendant

CASE NO. 95322

Garnishee

COURT FEES

Summons and proceedings thereon to judgment

\$1.00

Docketing each cause

.10

Law Library Fee

1.00

Garnishment

TOTAL \$

SHERIFF'S FEES

Levying Attachment

6.00

Entering and returning same

.25

Summoning Garnishee and making return

1.50

Serving Summons and other mesne process, and returning the same

1.50

Collecting execution for costs only

1.50

Serving any summons not herein provided for, and making return

1.50

TOTAL \$

GRAND TOTAL \$ 22.85

I respectfully call your attention to the above Court Cost Bill which if not paid by
19_____, it will be my unpleasant duty to issue execution on your property for the recovery of the same.

J. D. Richardson, Clerk

TRANSFER

NOTICE of ~~APPEAL~~ ~~XX~~

STATE OF ALABAMA, }
MOBILE COUNTY }

DEANNA TINDAL, a minor whosues by her
mother an d next friend, MR. L. V. TINDAL

Plaintiff

VS.

ALICE GAYLE THOMAS, C. G. HARRORD, ETC.

Defendant

To ALICE GAYLE THOMAS, C. G. HARRORD

in said Cause:

You are hereby notified that DEANNA TINDAL, a minor whosues by her
her mother and next friend, MRS. L. V. TINDAL

the PLAINTIFF in the above entitled cause has prayed and ob-
tained a transfer to the Circuit Court of Baldwin County, Alabama
from the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having
complied with the requirements of the law in such cases made and provided, the same has
been granted to the next term of the CIRCUIT COURT of Baldwin County, to be held for
said County, you are hereby notified accordingly.

Given under my hand this the 28 day of April 1971

Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 95322

DEANNA TINDAL, a minor who sues by her
mother and next friend, MRS. L. V. TINDAL

Plaintiff,

VS

ALICE GAYLE THOMAS, C. G. HARRORD

Defendant.

NOTICE OF ~~XXXXXX~~ TRANSFER DO
~~Baldwin County~~

Returnable To The Circuit Court of
Baldwin County

Issued: April 28, 1971

Serve On: ALICE GAYLE THOMAS
711 Fairhope, Ave.
Fairhope, Ala.
or e/o Riskarby & benton, Attorneys
P. O. Box 1471 Fairhope

~~THOMAS~~
C. G. HARRORD
Rt. 2, Box 125
Fairhope, Ala.
or e/o COLLINS, Galloway, Attys.

FILED

MAY 5 1971

EUNICE B. BLACKMON
CIRCUIT CLERK

GWEN BUSH HAWKINS, a minor,)
Plaintiff)
vs.)
ALICE GAYLE THOMAS, et al,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Case No. 9820

MOTION TO RETAX COSTS

Comes the Defendant in the above styled cause and moves the Court to retax costs on the grounds that the taxing of costs is contrary to law and taxed against an improper party.

Therefore, Defendant prays that notice be served upon the Attorney for Plaintiff and on the hearing of the cause, the Court will retax the costs against the Plaintiff in the above cause.

E. G. Rickarby
E. G. RICKARBY,
Attorney for Defendant.

OF COUNSEL:

Rickarby & Benton
Fairhope, Alabama

I hereby certify that a copy of the foregoing Motion has been mailed to J. George Whitfield, Esq., Attorney at Law, 210 Van Antwerp Building, Mobile, Alabama, postage prepaid.

E. G. Rickarby
E. G. Rickarby

FILED

APR 5 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

GWEN BUSH HAWKINS, a minor : IN THE CIRCUIT COURT OF
 who sues by her mother and :
 next friend, LEILA B. BUSH, : BALDWIN COUNTY,
 Plaintiff, : ALABAMA
 VS: :
 ALICE GAYLE THOMAS, G.C. :
 HARRORD, ET AL, : CASE NO. 9828
 Defendants. :

DEMURRER

Comes now the defendant, G.C. Harrord and demurs the plaintiff's complaint heretofore filed and to each count thereof separately and severally and assigns the following separate and several grounds:

1. The allegations thereof are insufficient to state a claim against this defendant and upon which relief can be granted.
2. The allegations thereof do not state a cause of action against the defendant.
3. The allegations thereof are vague, uncertain and indefinite.
4. The allegations thereof are so vague, uncertain and indefinite that the defendant is not sufficiently apprised of what he is called upon to defend against in this cause.
5. The allegations thereof are mere conclusions of the pleader unsupported by sufficient averment of fact.
6. The allegations thereof are insufficient to show as a matter of law that there was any legal duty owing by the defendant to the plaintiff at the time and with respect to the matters complained of therein.
7. The allegations thereof are insufficient to show as a matter of law that the defendant breached any legal duty owing by defendant to the plaintiff at the time and with respect to the matters complained of therein.

8. For aught appearing therein there was no sufficient causal connection between the plaintiff's damages complained of in the breach of any legal duty owing by the defendant to the plaintiff at the time and with respect to the matters complained of therein.

9. For that the allegations thereof are conflicting and repugnant in that more than one (1) defendant could not have been operating said motor vehicle at the time and place of the said accident.

COLLINS, GALLOWAY & MURPHY

BY:


Robert H. Smith

ATTORNEYS FOR DEFENDANT, G.C. HARRORD

Defendant, G.C. Harrord demands a trial by jury.

COLLINS, GALLOWAY & MURPHY

BY:


Robert H. Smith

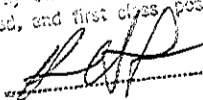
FILED

JUN 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 8th day of June, 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.



GWEN BUSH HAWKINS, a minor who sues
by her mother and next friend, LEILA
B. BUSH,

Plaintiff,

vs.

ALICE GAYLE THOMAS, G. C. HARRORD,
A, B, C, the persons, firms or cor-
porations who were the owners or
operators of that certain motor vehicle
which collided with the motor vehicle
the Plaintiff was riding in as a guest
passenger on to-wit: March 14, 1970,
and whose names are otherwise unknown
but will be added by amendment when
ascertained, jointly and individually,

Defendants

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

CASE NO. 9820

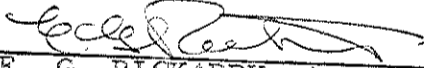
Comes the defendant, ALICE GAYLE THOMAS, in the
above-styled cause and offers the following separate and several
pleas to the plaintiff's complaint:

ONE

The defendant denies each and every allegation of
the plaintiff's complaint.

TWO

Not guilty.


E. G. RICKARBY, Attorney for Defendant


OF COUNSEL:

RICKARBY & BENTON
Fairhope, Alabama

FILED

MAY 28 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

CERTIFICATE OF ENTRY
This is to certify that the within complaint was
filed for record in the Circuit Court of Baldwin
County, Alabama, on the 26th day of May, 1971,
at 10:00 AM, and that the same was entered on
the docket of said court.
26 May 1971

Attest: Alice Gayle Thomas
G. C. Harrord

BROWN, HUDGENS, FULFORD, SINTZ & RICHARDSON
ATTORNEYS AT LAW

SUITE 210 VAN ANTWERP BUILDING

MOBILE, ALABAMA

36602

ALTON R. BROWN, JR.
A. NEIL HUDGENS
JAMES E. FULFORD
PETER V. SINTZ
JOHN D. RICHARDSON, III
J. GEORGE WHITFIELD, JR.
CLAUDE D. HARRELL

AREA CODE 205
432-2792

July
12th
1972

Mrs. Eunice Blackmon
Clerk, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama 36507

RE: Tindal vs. Thomas
Hawkins vs. Thomas
Case Numbers 9821 and 9820
Our File Number 71-6392-JGW

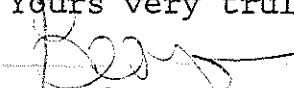
Dear Mrs. Blackmon:

We have received two notices from your office that the Defendant in the above referenced cases has failed to pay the Court Costs in these matters.

I have talked with Mr. Rickarby concerning this matter and he has assured me that he will look into this matter and have his client pay the Court Costs in both of these cases.

If the Defendant again fails to pay the Costs in question, please advise us.

Yours very truly,


For the Firm

JGWj/dma

cc: E. G. Rickarby, Esq.
Attorney at Law

[Faint, illegible text and markings across the top and middle of the page, possibly bleed-through from the reverse side.]

116,70
54.35
612.35
54.35
8.00

TRANSFER

NOTICE of APPEAL

STATE OF ALABAMA,
MOBILE COUNTY

OWEN BUSH BANKINS, a minor who sues by
her mother and next friend,
LEILA B. BUSH

Plaintiff

VS.

ALICE GAYLE THOMAS, O. C. HARRORD,
A, B, & the persons, firms or corp. who
were the owners or operators of that
certain motor vehicle etc. Defendant

To ALICE GAYLE THOMAS, O. C. HARRORD

in said Cause:

You are hereby notified that OWEN BUSH BANKINS, A minor who sues by
her mother and next friend, LEILA B. BUSH

the PLAINTIFF in the above entitled cause has prayed and ob-
tained a transfer to the Circuit Court of Baldwin County, Alabama,
from the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having
complied with the requirements of the law in such cases made and provided, the same has
been granted to the next term of the CIRCUIT COURT of Mobile County, to be held for
said County, you are hereby notified accordingly.

Given under my hand this the 28 day of April 1971

Clerk, Court of General Sessions of Mobile County, Civil Division



REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.

7
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(1)
(1)
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10
10

9820

vs

BY
TAYLOR WILKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING Z PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$ 14.⁰⁰

PROPERTY OF A TOTAL OF \$ 17.00

Defendant.

vi

Received _____ day of May 1971
and on 6 day of May 1971

I served a copy of the within Notice of Transfer

on Alice Grayle Thomas
S. C. Harold

By service on Wm. L. Tucker Thomas
W. C. Thomas

TAYLOR WIND, Street

By J. L. Cook

G. C. HARRORD
Rt. 2, Box 125
Fairhope, Ala.

or C/o Attorney - Collins, Galloway, etc.

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

958 DAUPHIN STREET

MOBILE, ALABAMA 36604

FRED G. COLLINS

THOMAS M. GALLOWAY

M. THOMAS MURPHY (1924-1956)

ROBERT H. SMITH

WILSON M. HAWKINS, JR.

June 8, 1971

P. O. Box 4492

TELEPHONE

432-0568

AREA CODE 205

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

Re: Gwen Bush Hawkins
Vs: Alice Gayle Thomas, et al

Dear Mrs. Blackmon:

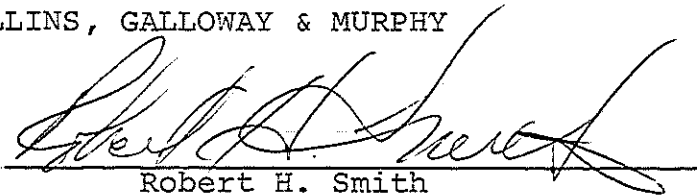
Would you please file the enclosed papers and indicate that you have done so by returning the enclosed carbon copy of this letter.

Thank you very much.

Very truly yours,

COLLINS, GALLOWAY & MURPHY

BY:



Robert H. Smith

RHS/jk
Enclosures

BROWN, HUDGENS, FULFORD, SINTZ & RICHARDSON

ATTORNEYS AT LAW

SUITE 210 VAN ANTWERP BUILDING

MOBILE, ALABAMA

36602

ALTON R. BROWN, JR.
A. NEIL HUDGENS
JAMES E. FULFORD
PETER V. SINTZ
JOHN D. RICHARDSON, III
J. GEORGE WHITFIELD, JR.
CLAUDE D. HARRELL

AREA CODE 205
432-2792

March 17, 1972

Mrs Eunice Blackmon
Clerk
Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama 36507

RE: Tindal VS Thomas
Hawkins VS Thomas
Case Numbers 9821 and 9820
Our File Number 71-6392-JGW

Dear Mrs. Blackmon:

We have settled the above referenced cases and the Defendants have paid us in full for the amount of the settlement

Will you please dismiss the above referenced cases with prejudice against the Defendants and send the Cost Bill to Mr. E. G. Rickarby, Box 417, Fairhope, Alabama 36532.

Yours very truly,


(dma)
For the Firm

JGWj/dma

cc: E. G. Rickarby, Esquire
Attorney at Law
Box 417
Fairhope, Alabama

E. G. RICKARBY
DANIEL A. BENTON
TELEPHONE
(205) 928-2308

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
316 MAGNOLIA AVENUE
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

DAPHNE BRANCH
EARLE REALTY BUILDING
HIGHWAY 98
TELEPHONE
(205) 626-2608

March 30, 1972

Mrs. Eunice Blackmon
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Inre: Tindal and Hawkins vs. Alice Gayle Thomas
Our File No. 70-81

Dear Mrs. Blackmon:

Enclosed find two (2) Motions to Retax Costs in the above
referenced matter. Please file. I'm obliged.

Yours very truly,


E. G. Rickarby

EGR:lp
Enclosures

cc: Mr. J. George Whitfield, Jr.
Attorney at Law

TRANSFER

NOTICE of ~~XXXXXXXXXXXX~~ ~~XXXXXXXXXXXX~~

STATE OF ALABAMA,)
MOBILE COUNTY)

GWEN BUSH HAWKINS, a minor whom sues by
her mother and next friend,
LEILA B. BUSH

Plaintiff

VS.

ALICE GAYLE THOMAS, G. C. HARRORD,
A,B,C the persons, firms or corp. who
were the owners or operators of that
certain motor vehicle etc. Defendant

To ALICE GAYLE THOMAS, G. C. HARRORD

in said Cause:

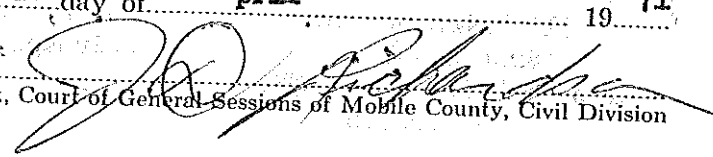
You are hereby notified that GWEN BUSH HAWKINS, A minor who sues by
her mother and next friend, LEILA B. BUSH

the **PLAINTIFF**

a transfer to the Circuit Court of Baldwin County, Alabama.
XX
from the
COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having

complied with the requirements of the law in such cases made and provided, the same has
been granted to the next term of the **CIRCUIT COURT of Baldwin County**, to be held for
said County, you are hereby notified accordingly.

Given under my hand this the 28 day of April 19 71


Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 95324

**GWEN BUSH HAWKINS, a minor who sues by her
mother and next friend, Leila B. Bush**

Plaintiff,

VS

**ALICE GAYIE THOMAS, G. C. HARRORD, ETC.
711 Fairhope Ave. Rt. 2, Box 125
Fairhope, Ala. Fairhope, Ala.**

Defendant.

NOTICE OF ~~ARREST~~ TRANSFER

**Returnable To The Circuit Court OF
Baldwin County**

Issued: April 28, 1971

Serve On: **ALICE GAYIE THOMAS
711 Fairhope Ave.
Fairhope, Ala.
or e/o RICKARBY & BENTON
Attorneys**

**G. C. HARRORD
Rt. 2, Box 125
Fairhope, Ala.**

or C/o Attorney - Collins, Galloway, etc.

FILED
MAY 5 1971
CLERK
EUNICE B. BLACKMON
Circuit

COST BILLFOREMAN, BROWN & HUDGENS
ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.

~~GWEN BUSH HAWKINS, ETC., ET AL~~

Plaintiff

~~ALICE GAYLE THOMAS, G. C. HARRORD~~

Defendant

CASE NO. 95324

Garnishee

COURT FEES

Summons and proceedings thereon to judgment

\$1.00

Docketing each cause

.10

Law Library Fee

1.00

Garnishment

TOTAL \$

SHERIFF'S FEES

Levying Attachment

6.00

Entering and returning same

.25

Summoning Garnishee and making return

1.50

Serving Summons and other mesne process, and returning the same

1.50

Collecting execution for costs only

1.50

Serving any summons not herein provided for, and making return

1.50

TOTAL \$

GRAND TOTAL \$ 22.85

I respectfully call your attention to the above Court Cost Bill which if not paid by _____,
19_____, it will be my unpleasant duty to issue execution on your property for the recovery of the same.

J. D. Richardson, Clerk

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 95324

GWEN BUSH HAWKINS, a minor who
sues by her mother and next friend,
LEILA B. BUSH

Plaintiff

VS

ALICE GAYLE THOMAS, G. C. HARRORD,
A,B,&, the persons, firms or
corporations who were the owners of
operators of that certain motor vehicle
the plaintiff was riding in as a guest
passenger on to-wit: March 14, 1970 and
whose names are otherwise unknown but
will be added by Amendment when
ascertained, jointly and individually

Amount of Claim: \$300.00

Filed:

Sum mons Issued:

Returnable:

Service Had:

Cause of Action:

Attorney for Plaintiff: Foreman, Brown & Hudgens

Attorney for Defendants: Riekarby & Benton
for Aliee Gayle Thomas
Collins, Galloway, etc.
for G. C. Harrord

March 31, 1971 - Defendant's Plea in Abatement filed (ALICE GAYLE THOMAS)

April 8, 1971 - Defendant's Harrord Plea in Abatement filed

April 20, 1971 - Pleas Confessed by Plaintiff

April 20, 1971 - Cause Transferred to Baldwin County Circuit Court

Paul G. Broun

I hereby certify that the foregoing is a true and correct copy of the
above styled cause, as it appears on record and in the files of the Court of
General Sessions of Mobile County, Alabama.

Witness my hand this the 28 day April, 1971.

John B. Robinson
Clerk of The Court of General
Sessions of Mobile County,
Alabama.

9861

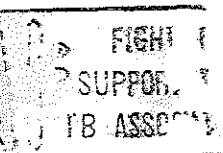
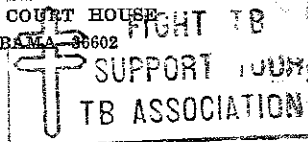
The enclosed papers numbered from 1 to 6, include all the original papers in
the case of DEANNA TINDAL, ET.C VS ALICE GAYLE THOMAS, C. E. HARRORD, Case No. 95322

J. O. Richardson
CLERK OF THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY, ALABAMA

THE COURT OF GENERAL SESSIONS



MOBILE COUNTY COURT HOUSE
MOBILE, ALABAMA 36602



MRS. ALICE J. DUCK, Circuit Clerk
Baldwin County Court House
Bay Minette, Alabama