

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

June 14, 1971

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

Re: Coleman Vs. Grace & Preston
Case #9859 (Civil)

Dear Eunice:

Please file the enclosed answer.

Yours very truly,


Wilson Hayes

WH/ms
Enc.

ROBERT DALE COLEMAN,

Plaintiff,

Vs.

ERNEST GRACE, JR. and
JOHN T. PRESTON,

Defendants.

§

IN THE CIRCUIT COURT OF

§

BALDWIN COUNTY, ALABAMA

§

AT LAW

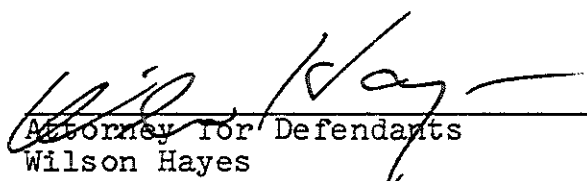
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§

NUMBER: 9859

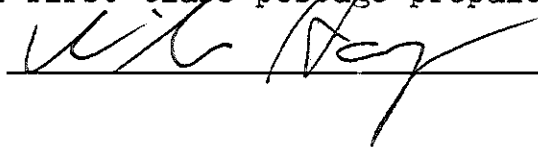
Comes now Defendants in the above styled cause and
for answer say:

1. Not guilty.


Attorney for Defendants
Wilson Hayes

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 14 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, with first class postage prepaid.



FILED

JUN 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

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 Ernest Grace, Jr. and John T. Preston 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 Otis L. Baggett.

WITNESS my hand this 15th day of ^{JUNE}~~MAY~~, 1971.

Eunice B. Blackmon
Clerk

ROBERT DALE COLEMAN,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

ERNEST GRACE, JR. and
JOHN T. PRESTON,

X

X

AT LAW 9859

Defendants.

COMPLAINT

Comes now the Plaintiff in the above styled cause and claims of the Defendants the sum of Six Hundred Dollars (\$600.00) as damages for that heretofore, on, to-wit, the 15th day of November, 1970 at the intersection of Hand Avenue and 9th Street in Bay Minette, Baldwin County, Alabama, the Defendant, Ernest Grace, Jr., who was at said time and place the agent, servant or employee of the Defendant John T. Preston and acting within the line and scope of his authority as such agent, servant or employee, did so negligently operate a motor vehicle as to cause

or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff and as a proximate result of such negligence, the Plaintiff's automobile received severe injuries and damages to its rear bumper, fenders and trunk lid in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

BY: 

Defendant John T. Preston may
be served at 76 Brownwood Avenue,
Bay Minette, Alabama.

FILED

JUN 1 1971

Defendant Ernest Grace, Jr. may
be served at 35 Brownwood Avenue,
Bay Minette, Alabama.

EUNICE B. BLACKMON CIRCUIT
CLERK

9859

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

ROBERT DALE COLEMAN,

Plaintiff,

VS.

ERNEST GRACE, JR. and
JOHN T. PRESTON,

Defendants.

* * * * *

SUMMONS AND COMPLAINT

FILED

* * * * *

JUN 1 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

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

Received _____ day of _____ June 19 71
and on _____ day of _____ June 19 71
I served a copy of the within _____ S & C
on _____ Ernest Grace Jr
John T. Preston
By service on _____

TAYLOR WILKINS, Sheriff
By *W. C. Blackmon*