

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 Zollie McBride and Lilla Maddax 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 John Youngblood.

WITNESS my hand this 22nd day of October, 1971.

Ernie B. Blackmon
Clerk

JOHN YOUNGBLOOD,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
ZOLLIE McBRIDE and	X	AT LAW
LILLA MADDAX,	X	
Defendants.	X	10,086

The Plaintiff claims of the Defendants the sum of Two Hundred and Fifty Dollars (\$250.00) as damages for that heretofore, on, to-wit: the 4th day of January, 1971, at the intersection of D'Olive and Pine Streets in Bay Minette, Baldwin County, Alabama, the Defendant, Zollie McBride, who was at said time and place the agent, servant or employee of the Defendant Lilla Maddax and at said time and place acting within the line and scope of his employment 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 the negligence of the Defendants as aforesaid, the Plaintiff's vehicle was damaged in that the front bumper, the left front fender and the hood were bent, damaged or broken, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

Serve the Defendant Zollie
McBride at Uriah, Alabama

Serve the Defendant Lilla
Maddax at Excel, Alabama

FILED

OCT 22 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Executed this 18th day of November, 1971 by
serving copy of the within on
Zollie McBride and Lilla Maddax.

E. C. Watson Sheriff
by L. Sager D/S

E. C. Watson, Sheriff of Monroe County,
Ala., claims \$1.50 ea. for services 2
Process(es). And 10¢ per mile for 70
miles. Total \$ 10.00
L. Sager Deputy Sheriff

JOHN YOUNGBLOOD,

Plaintiff,

vs.

ZOLLIE MCBRIDE and LILLA
MADDAX,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

SUMMONS AND COMPLAINT

OCT 22 1971

LATON, ALABAMA
SHERIFF

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

10,086

CAUSEY & McLANEY
ATTORNEYS AT LAW
MONROE COUNTY BANK BUILDING
MONROEVILLE, ALABAMA 36460

WM. JOHN CAUSEY, JR.
C. KNOX McLANEY III

November 16, 1971

POST OFFICE BOX 761
TELEPHONE 743-4358

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

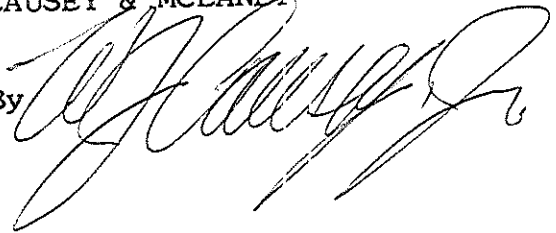
Dear Mrs. Blackmon:

Enclosed is a plea in abatement to be filed in the
Court in Baldwin County.

I have mailed a copy to the plaintiff's attorney.

Very sincerely yours,
CAUSEY & MCLANEY

By



JOHN YOUNGBLOOD,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
ZOLLIE McBRIDE and	X	AT LAW 10,086
LILLA MADDAX,	X	
Defendants.	X	

AMENDMENT TO COMPLAINT

Comes now the Plaintiff in the above styled cause and amends said complaint so that the same shall read as follows:

JOHN YOUNGBLOOD,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
ZOLLIE McBRIDE, JR. and	X	
LILLA MADDAX,	X	AT LAW
Defendants.	X	

The Plaintiff claims of the Defendants the sum of Two Hundred and Fifty Dollars (\$250.00) as damages for that heretofore, on, to-wit: the 4th day of January, 1971, at the intersection of D'Olive and Pine Streets in Bay Minette, Baldwin County, Alabama, the Defendant, Zollie McBride, Jr. who was at said time and place the agent, servant or employee of the Defendant Lilla Maddax and at said time and place acting within the line and scope of his employment 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 the negligence of the Defendants as aforesaid, the Plaintiff's vehicle was damaged in that the front

bumper, the left front fender and the hood were bent, damaged or broken, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: *John E. Chason*
Attorneys for Plaintiff

✓ Serve the Defendant Zollie
McBride, Jr. at Uriah, Alabama

Serve the Defendant Lilla
Maddax at Excel, Alabama

FILED

DEC 3 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

John Youngblood

vs:

Zollie McBride
& Lillia Madday

Chasen, Stess & Chasen

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 10,086

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Zollie McBride, Jr.

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.....

Zollie McBride & Lilla Maddax

Defendant.....

by John Youngblood

Plaintiff.....

Witness my hand this 3rd day of Dec. 1971

Eunice B. Blackburn, Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JOHN YOUNGBLOOD

Plaintiffs

vs.

ZOLLIE McBRIDE & LILLIA MADDAX

Defendants

SUMMONS AND COMPLAINT

Filed Dec. 3, 19 71

EUNICE B. BLACKMON Clerk

DEC 6 1971

TAYL

SHERIFF

CHASON, STONE & CHASON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

DEC 6 1971

19.....

WILKINS

Sheriff

I have executed this summons

this

Dec. 28th

19 71

by leaving a copy with

Zollie M^{rs} Bride, Jr.E. C. Watson, Sheriff of Monroe County,
Ala., claims \$1.50 ea. for services 1Process(es). And 10¢ per mile for 60
miles.Total \$ 7.50

L. Sager

Deputy Sheriff

E. C. Watson

Sheriff

L. Sager

Deputy Sheriff

JOHN YOUNGBLOOD,)	IN THE CIRCUIT COURT OF
)	
Plaintiff,)	BLADWIN COUNTY, ALABAMA,
)	
VS.)	AT LAW.
)	
ZOLLIE MCBRIDE and)	CASE NO. <u>10,084</u>
LILLA MADDAX,)	
Defendants,)	

PLEA IN ABATEMENT

Comes now Zollie McBride, Sr., served as a defendant in the above entitled cause, and appears solely and specially for the purpose of filing this plea in abatement, and for no other purpose, and pleading in abatement, says:

That he is Zollie McBride, Sr., father of Zollie McBride, Jr. That Zollie McBride, Jr., was involved in said accident complained of in the plaintiff's complaint; that his father, Zollie McBride, Sr., has been served as a defendant in the above styled cause, but is not now, and at no time has he been an agent of Lilla Maddax, and at no time was he involved in the incident complained of by the plaintiff.

Wherefore, defendant says that this suit should be abated, and should not be allowed to proceed.

[Signature]
Attorney for the Defendant

STATE OF ALABAMA,

MONROE COUNTY.

Before me, the undersigned authority, personally appeared Zollie McBride, Sr., who being by me first duly sworn deposes and says that he has read the foregoing, has knowledge of the facts herein contained, and that the same are true and correct.

Zollie McBride Sr.
Zollie McBride, Sr.

Sworn to and subscribed before me this 19th day of November, 1971.

Marie Greuber
NOTARY PUBLIC, MONROE COUNTY, ALABAMA

my Commission expires 12-7-72

FILED

NOV 19 1971

EUNICE B. BLACKMON CIRCUIT CLERK