

LYONS, PIPES & COOK

ATTORNEYS AT LAW  
2510 FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA

JOSEPH H. LYONS (1900-1957)  
SAM W. PIPES  
WALTER M. COOK  
GORDON B. KAHN  
G. SAGE LYONS  
AUGUSTINE MEASER, III.  
WESLEY PIPES  
NORTON W. BROOKER, JR.  
COOPER C. THURBER

36601

AREA CODE 205  
TEL. 432-4483  
P. O. DRAWER 2727

June 9, 1972

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

Re: Denard Lambeth vs. Herman Thomas  
Case No: 10,164

Dear Mrs. Blackmon:

This case is set for disposition on June 13, 1972.  
It is ready for a default judgment. I have to be  
in Bay Minette on June 15, 1972 for the Motion  
Docket and I would appreciate this matter being set  
on that day for a default judgment. If you are unable  
to do this, then I would appreciate you giving me a  
collect call so that I can make the proper arrangements.

Very truly yours,

LYONS, PIPES AND COOK

  
Cooper C. Thurber

CT/sc

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COOPER C. THURBER

December 16, 1971

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

Dear Mrs. Blackmon:

Enclosed, please find an original and two copies of a Complaint that we wish to file in the Circuit Court of Baldwin County. We would appreciate you marking one copy of the Complaint filed and returning same to us in the enclosed envelope.

Thanking you in advance, I am,

Very truly yours,

LYONS, PIPES AND COOK

  
Cooper C. Thurber

CT/sc

Enclosures

*10, 164*

*Please sign complaint*  
*Eunice*

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June 13, 1972

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

Re: Denard Lambeth vs. Herman Thomas  
Circuit Court Case No: 10,164

Dear Mrs. Blackmon:

This is to confirm our conversation wherein you advised that the above case would be reset for damages on the next Motion Docket day (June 21, 1972) at which time we will take a default judgment and present testimony as to the amount of damages.

I am enclosing a copy of this letter along with a self-addressed return envelope and it would be appreciated if you would stamp this letter so that I will know it has been received by you and that the above case has been reset for June 21, 1972.

Thanking you for your cooperation in this matter, I am

Very truly yours,

LYONS, PIPES AND COOK



Cooper C. Thurber

CT/sc

Enc.

DENARD LAMBETH,

Plaintiff,

-vs-

HERMAN THOMAS,

Defendant.

)

)

)

)

)

IN THE CIRCUIT COURT

BALDWIN COUNTY,

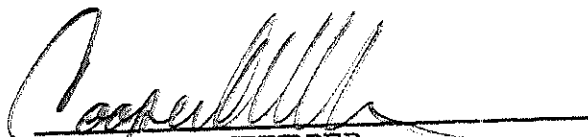
ALABAMA

CASE NO: 10,164

COUNT ONE

The Plaintiff claims of the Defendant the sum of ONE THOUSAND AND NO/100 (\$1,000.00) DOLLARS, as damages, for that heretofor and on, to-wit, May 31, 1971, the Plaintiff was driving his automobile on Douglas Avenue in the City of Brewton, State of Alabama, and the Defendant did then and there negligently cause or allow another motor vehicle to collide with the Plaintiff's automobile at said time and place and as a proximate consequence of said negligence of the Defendant, the Plaintiff's automobile was bent, broken, smashed, and rendered permanently less valuable; the Plaintiff lost the use of said automobile for a considerable period of time; all for which the Plaintiff claims damages.

LYONS, PIPES AND COOK  
Attorneys for Plaintiff

  
COOPER C. THURBER

DEFENDANT MAY BE SERVED AT:

Route 1,  
Castleberry, Alabama

FILED

DEC 23 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 10,164

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Herman Thomas

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.....

Herman Thomas Defendant.....

by Denard Lambeth

Plaintiff.....

Witness my hand this 23 day of December 19 71

*Emmie B. Blackburn* Clerk

No. 10,164

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DENARD LAMBETH

Plaintiffs

vs.

HERMAN THOMAS

Defendants

SUMMONS AND COMPLAINT

Filed Dec. 23, 1971

Eunice B. Blackmon Clerk

FILED

DEC 23 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

Lyons, Pipes & Cook  
Plaintiff's Attorney

DEC 23 1971  
Defendant's Attorney

JAMES M. BROCK  
SHERIFF

Defendant lives at

Rt. 1

Castleberry, Ala.

Received In Office

19.....

Sheriff

I have executed this summons

this Dec 28 1971

by leaving a copy with

Herman Thomas

James M. Brock Sheriff

W H Weanu Deputy Sheriff

20 miles

LYONS, PIPES & COOK

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COOPER C. THURBER

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June 22, 1972

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

Re: Denard Lambeth vs. Herman Thomas  
Circuit Court Case No. 10,164

Dear Mrs. Blackmon:

Please enter nonsuit at the instance of the plaintiff  
and forward cost bill at your earliest convenience.

Very truly yours,

LYONS, PIPES AND COOK

  
Cooper C. Thurber

CT/sc