

PETER JAMES VALLAS,

Plaintiff,

-vs-

FRED LYNN FRITH,

Defendant.

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY,

X

ALABAMA

X

CIVIL DIVISION

X

CASE NUMBER _____

COMPLAINT

Plaintiff claims of the Defendant the sum of ONE THOUSAND FIVE HUNDRED AND NO/100 (\$1,500.00) DOLLARS, as damages, for that heretofore and on, to-wit: The 18th day of March, 1972, the Defendant so negligently operated a motor vehicle he was driving on or along Beach Drive, said street being a public street in the County of Baldwin, State of Alabama, so as to cause or allow the same to run into, upon, over or against the motor vehicle of the Plaintiff and as a direct and proximate result of the negligence of the Defendant as aforesaid, Plaintiff's automobile was badly bent, broken and damaged, and the value thereof permanently depreciated, and Plaintiff lost the use of his automobile.

WHEREFORE, Plaintiff sues and seeks to recover in the amount of ONE THOUSAND FIVE HUNDRED AND NO/100 (\$1,500.00) DOLLARS.

MARR AND FRIEDLANDER

Attorneys for Plaintiff

BY

Thomas R. Marr
For the firm

Defendant may be served:

Windmill Ridge Drive
Ninth house on left
Gulf Shores, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,313

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Fred Lynn Frith

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.....

Fred Lynn Frith

....., Defendant.....

by Peter James Vallas

....., Plaintiff.....

witness my hand this..... 24th day of..... March 19..72.

Ernest B. Blackman, Clerk

No. 10,313

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

PETER JAMES VALLAS

Plaintiffs

VS.

FRED LYNN FRITH

Defendants

SUMMONS AND COMPLAINT

Filed March 24, 19.72..

Eunice B. Blackmon

Clerk

MAR 24 1972

TAYLOR WILKINS
SHERIFF

Marr & Friedlander

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office
MAR 24 1972

TAYLOR WILKINS
SHERIFF

19.....

Sheriff

I have executed this summons

this March 27 19.72

by leaving a copy with

Fred L. Frith

Sheriff's fee: 1.00 miles at

Ten Cents per mile Total \$ 10.00

TAYLOR WILKINS, Sheriff

BY *[Signature]*
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

LAW OFFICES

MARR AND FRIEDLANDER

158 ST. LOUIS STREET • POST OFFICE BOX 1792

THOMAS M. MARR
MAURY FRIEDLANDER
RALPH LOVELESS
GARY P. ALIDOR

MOBILE, ALABAMA 36601

TELEPHONE 432-4554

March 22, 1972

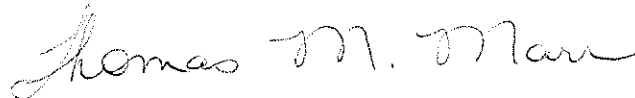
Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: Peter James Vallas
-vs- Fred Lynn Frith

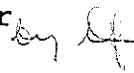
Dear Mrs. Blackmon:

Please file the enclosed suit on our behalf. Thank
you for your assistance.

Very truly yours,



Thomas M. Marr



TMM.df

Encl.

LAW OFFICES

MARR AND FRIEDLANDER

158 ST. LOUIS STREET • POST OFFICE BOX 1792

THOMAS M. MARR
MAURY FRIEDLANDER
RALPH LOVELESS
GARY P. ALIDOR

MOBILE, ALABAMA 36601

TELEPHONE: (205) 432-4554

August 3, 1972

Ms. Eunice B. Blackmon, Clerk
Circuit Court of Baldwin County
Post Office Box 239
Bay Minette, Alabama 36507

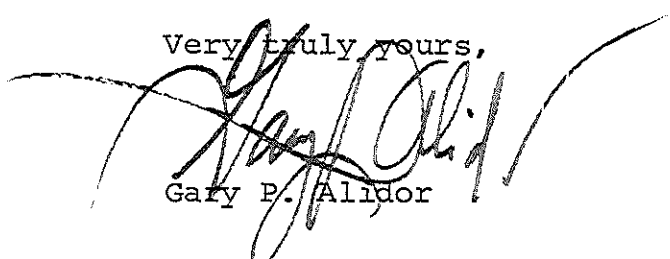
Re: VALLAS, Peter James
-VS-
FRITH, Fred Lynn
Case No. 10,313
Our File No. 14,513-72

Dear Ms. Blackmon:

Pursuant to your telephone conversation with my secretary yesterday concerning this matter, please be advised that the Defendant, Fred Lynn Frith, has fully satisfied the judgment in this case and we are in the process of having a cancellation executed by the Plaintiff which will be filed with the Honorable Harry D'Olive, Judge of Probate to cancel the recorded judgment in this matter.

Please hold execution for the judgment and let the execution for costs issue as they remain unpaid.

Very truly yours,


Gary P. Alidor

:ab

Recall
EX-

LAW OFFICES

MARR AND FRIEDLANDER

158 ST. LOUIS STREET • POST OFFICE BOX 1792

THOMAS M. MARR
MAURY FRIEDLANDER
RALPH LOVELESS
GARY P. ALIDOR

MOBILE, ALABAMA 36601

TELEPHONE: (205) 432-4554

August 16, 1972

Ms. Eunice B. Blackmon, Clerk
Circuit Court of Baldwin County
Post Office Box 239
Bay Minette, Alabama 36507

Re: VALLAS, Peter James
-vs-
FRITH, Fred Lynn
Case No. 10,313
Our File No. 14,513-72

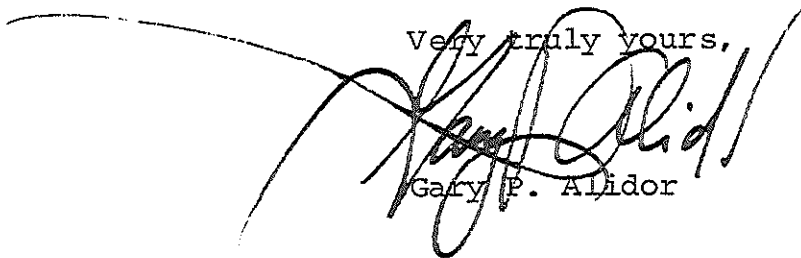
Dear Mrs. Blackmon:

Enclosed herewith please find an executed copy of the individual cancellation which has been filed in the Probate Court.

Please file this copy in the Court's file in order that it will be a part of the permanent record in this case.

Your assistance in this matter is appreciated.

Very truly yours,


Gary P. Alidor

:ab
Encl:1

INDIVIDUAL CANCELLATION

STATE OF ALABAMA)

COUNTY OF MOBILE)

The debt secured by Certificate of Judgment recorded in Book 20 at page 45 of the Records in the Office of the Judge of Probate of Baldwin County, Alabama, in favor of PETER JAMES VALLAS and against FRED LYNN FRITH, having been paid in full, said lien is hereby fully cancelled this, the 3rd day of August, 1972.

Peter J. Vallas
PETER JAMES VALLAS

STATE OF ALABAMA)

COUNTY OF MOBILE)

I, Queen Courtland Barron, a Notary Public in and for said County and State, hereby certify that PETER JAMES VALLAS, whose name is signed to the foregoing release and cancellation, and who is known to me, acknowledged before me that being informed of the contents of said instrument, he executed the same voluntarily on the day the same bears date.

GIVEN under my hand and seal this, the 3rd day of August, 1972.

Queen Courtland Barron
Notary Public

FILED

AUG 18 1972

EUNICE B. BLACKMON CIRCUIT CLERK