

LARRY J. PATTON

PLAINTIFF

VS

ERNEST LEE JONES

DEFENDANT

X IN THE CIRCUIT COURT OF

X BALDWIN COUNTY, ALABAMA

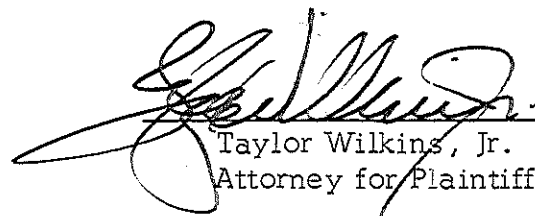
X AT LAW

X

X CASE NO:

COMPLAINT

The Plaintiff claims of the Defendant the sum of ONE THOUSAND FIVE HUNDRED (\$1,500.00) DOLLARS as damages for that, heretofore, on, to-wit, September 4, 1970, the Plaintiff, Larry J. Patton, was operating his automobile on Alabama Highway No. 225, a public road in the County of Baldwin, State of Alabama, at a point approximately, to-wit, 3.7 miles North of Spanish Fort, Alabama, and the Defendant, Ernest Lee Jones, so negligently operated a motor vehicle at said time and place aforesaid, in said County and said State, that the said automobile then and there collided with the automobile which the said Larry J. Patton was then and there operating, and as a proximate result of the negligence as aforesaid, Plaintiff's automobile was severely damaged and was rendered less valuable, all to his damage in the sum aforesaid, hence this suit.

  
Taylor Wilkins, Jr.  
Attorney for Plaintiff

FILED

APR 4 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,334

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Ernest Lee Jones

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.....

Ernest Lee Jones

Defendant.....

by Larry J. Patton

Plaintiff.....

witness my hand this 4th day of April 19 72

*Ernest L. Patton* Clerk

No. 10,334

Page.....

STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

LARRY J. PATTON

Plaintiffs

VS.

ERNEST LEE JONES

Defendants

SUMMONS AND COMPLAINT

Filed April 4, 1972

Eunice B. Blackmon Clerk

FILED

APR 4 1972

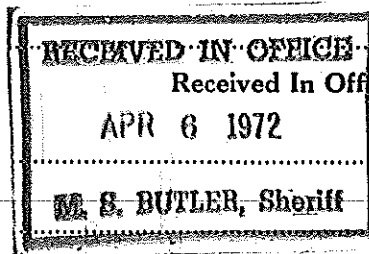
EUNICE B. BLACKMON  
CIRCUIT  
CLERK

Taylor Wilkins, Jr.  
Plaintiff's Attorney

APR 5 1972  
Defendant's Attorney

JAYLOR WILKINS  
SHERIFF

Defendant lives at



I have executed this summons

this 19.....  
by leaving a copy with

Executed by serving 3 copies of  
the within on M. S. Butler,  
Secretary of State of The State of  
Alabama.

This the 7 day of Apr 1972

Sheriff of Montgomery County...

M. S. Butler,

By M. S. Butler, D. S.

M. S. Butler, Sheriff of Montgomery

County, Alabama, Claim \$1.50 each for

serving 1 process(es) and \$1.00  
travel expense on each of 1 Sheriff

process(es), or a total of 250  
Deputy Sheriff

M. S. Butler  
Deputy Sheriff



MABEL S. AMOS  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY, ALABAMA 36104  
269-6185  
AREA CODE 205

October 5, 1972

10,334

Honorable Taylor D. Wilkins, Jr.  
P. O. Box 546  
Bay Minette, Alabama 36507

Dear Mrs. Wilkins:

Re: LARRY J. PATTON VS ERNEST LEE JONES, Defendant

Please refer to your file in the above-styled cause and be advised that on September 14, 1972, I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Ernest Lee Jones  
2215 MacPhelan Road  
Moss Point, Mississippi 39563

On October 5, 1972, this letter (Certified No. 53671) was returned to me with reason for non-delivery given as "UNCLAIMED".

If you would like to further pursue service on this defendant, according to the provisions of Title 7, Section 199, an additional \$2.00 deposit will enable me to attempt personal service by local law enforcement officers.

Will you please advise me as to any further steps you wish me to take in perfecting this service.

Yours very truly,

fc

Mabel S. Amos  
Secretary of State

CC: Honorable Eunice B. Blackmon, Clerk  
Circuit Court of Baldwin County  
Court House  
Bay Minette, Alabama 36507

September 12, 1972

Mrs. Mabel S. Amos  
Secretary of State  
Montgomery, Alabama 36104

RE: Larry J. Patton

vs

Ernest Lee Jones 10,334

Dear Mrs. Amos:

I have been informed that Mr. Ernest Lee Jones now resides at 2215 MacPhelah Road, Moss Point, Mississippi, and is employed with Ingalls Shipbuilding Corporation in Pascagoula. I would appreciate very much you attempting to perfect service on the Defendant at the above address.

Thanking you for your previous efforts and with kindest regards, I am

Very truly yours,

Taylor Wilkins, Jr.

TWjr:sp

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



MABEL S. AMOS  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY, ALABAMA 36104  
269-6185  
AREA CODE 205

May 2, 1972

Hon. Taylor D. Wilkins, Jr.  
P. O. Box 61  
Bay Minette, Alabama 36507

Dear Mr. Wilkins:

Re: LARRY J. PATTON, Plaintiff vs ERNEST LEE JONES, Defendant

Please refer to your file in the above-styled cause and be advised that on April 7, 1972, I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Ernest Lee Jones  
107½ Meridian Street  
Moss Point, Mississippi 39563

On April 27, 1972, this letter (Certified No. 54642) was returned to me with reason for non-delivery given as "UNCLAIMED".

If you would like to further pursue service on this defendant, according to the provisions of Title 7, Section 199, an additional \$2.00 deposit will enable me to attempt personal service by local law enforcement officers.

Will you please advise me as to any further steps you wish me to take in perfecting this service.

Yours very truly,

*Mabel S. Amos*  
Mabel S. Amos  
Secretary of State

cln

cc: Hon. Eunice B. Balckmon, Clerk  
Circuit court of Baldwin  
County, Alabama, At Law  
Bay Minette, Alabama 36507

10,334



MABEL S. AMOS  
SECRETARY OF STATE

STATE OF ALABAMA  
OFFICE OF SECRETARY OF STATE  
MONTGOMERY, ALABAMA 36104  
269-6185  
AREA CODE 205

June 23, 1972

Hon. Taylor D. Wilkins, Jr.  
P. O. Box 546  
Bay Minette, Alabama 36507

Dear Mr. Wilkins:

Re: LARRY J. PATTON Vs ERNEST LEE JONES, Defendant

Please refer to your file in the above-styled cause and be advised that on May 31, 1972, I sent by certified mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Ernest Lee Jones  
1017 1/2 Meridian Street  
Moss Point, Mississippi 39563

On June 21, 1972, this letter (Certified No. 54939) was returned to me with reason for non-delivery given as "UNCLAIMED"

If you would like to further pursue service on this defendant, according to the provisions of Title 7, Section 199, an additional \$2.00 deposit will enable me to attempt personal service by local law enforcement officers.

Will you please advise me as to any further steps you wish me to take in perfecting this service.

Yours very truly,

sm

Mabel S. Amos  
Secretary of State

CC: Hon. Eunice B. Blackmon, Clerk  
Circuit Court of Baldwin County  
Court House  
Bay Minette, Alabama 36507

10,334

LARRY J. PATTON

PLAINTIFF

VS

ERNEST LEE JONES

DEFENDANT

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

X

AT LAW

X

X

CASE NO: 10,334

STATE OF ALABAMA

BALDWIN COUNTY

Comes now Taylor Wilkins, Jr., attorney of record for the Plaintiff in this cause, being duly sworn on oath, deposes and says:

That in belief of such affiant, Defendant, Ernest Lee Jones, owner of and operator of one of the vehicles referred to in the complaint, is a non-resident of the State of Alabama, and not qualified under the laws of the State of Alabama as a non-resident doing business in the State of Alabama;

That to the best of affiant's knowledge, information and belief, the Post office address of said Defendant is as follows:

Ernest Lee Jones  
1017 1/2 Meridian Street  
Moss Point, Mississippi 39563

The Plaintiff request that process shall be issued as provided for by Title 7, Section 199, Code of Alabama, as recompiled in 1958.

  
Taylor Wilkins, Jr.

Sworn to and subscribed before me on this the 26<sup>th</sup> day of May, 1972.

  
Notary Public

FILED

MAY 26 1972

EUNICE B. BLACKMON CIRCUIT  
CLERK