

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 J. R. Leonard 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 Charles Melvin.

WITNESS my hand this 10 day of July, 1972.

Junice B. Blackburn
Clerk

CHARLES MELVIN,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

BALDWIN COUNTY, ALABAMA

X

J. R. LEONARD,

X

AT LAW NO: 10484

Defendant.

X

The Plaintiff claims of the Defendant Nine Thousand Five Hundred Dollars (\$9,500.00) as damages for that on, heretofore, to-wit: The 1st day of December, 1971, on Battleship Parkway, at a point 2.4 miles East of the city limits of Mobile, Alabama, which point is in Baldwin County, Alabama and is a public highway, the Defendant, J. R. Leonard, who was then and there acting by and through his agent, servant or employee, Hansell J. Vonier, and who was then and there acting within the line and scope of his employment so negligently operated a motor vehicle as to cause or allow the same to collide with a motor vehicle being then and

there operated by one Bill Williams and as a proximate consequence and result of the negligence of the Defendant aforesaid, the motor vehicle being then and there operated by the said Bill Williams was caused to run into, upon or against the motor vehicle of the Plaintiff and as a proximate consequence and result of the negligence of the Defendant aforesaid, acting by and through his agent, servant or employee, who was then and there acting within the line and scope of his employment as such, the Plaintiff suffered the following damages: His motor vehicle was bent, broken and smashed in and about the front end and engine thereof, and he was caused to lose the use thereof for a period of fifty-six (56) days; all to the damage of the Plaintiff, wherefore he brings this suit and asks judgment in the above amount.

CHASON, STONE & CHASON

BY:


Attorneys for Plaintiff

Defendant's address

for service is

P. O. Box 10

Pinkard, Alabama

FILED

JUL 10 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Executed this 25th day of

July, 1972

by handing a copy of the within
Summons and Complaint to

J.R. Leonard

Defendant.

Dale Co. Ala

Sheriff.

THE SHERIFF CLAIMS 25 MILES
AT 10c PER MILE FOR A TOTAL OF

\$ 2.50

W. Walker
WILLIAM WALKER, Sheriff

By

Deputy Sheriff

CHARLES MELVIN,

Plaintiff,

vs.

J. R. LEONARD,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,484

SUMMONS AND COMPLAINT

RECEIVED

JUL 12 1972

TAYLOR WILKINS

CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. Box 120

BAY MINETTE, ALABAMA

CHARLES MELVIN,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

J. R. LEONARD,

X

AT LAW NO: 10,484

Defendant.

X

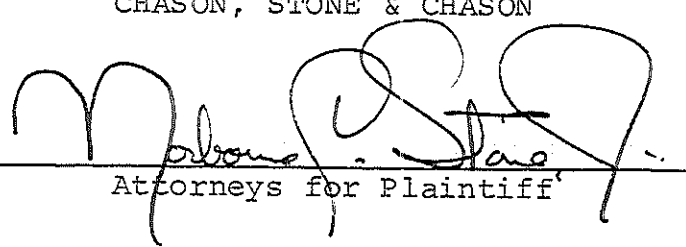
INTERROGATORIES PROPOUNDED
BY PLAINTIFF TO DEFENDANT

Comes now the Plaintiff in the above styled cause,
by his attorneys, and propounds the following Interrogatories to
the Defendant:

1. Please state your correct name and address.
2. Were you, on December 1, 1971, the owner of a 1971
Kenworth Tractor, Identification Number 123149, bearing Florida
license tag for the year 1972 numbered 25C/V474?
3. Was said motor vehicle on December 1, 1971 involved
in an accident on Battleship Parkway in Baldwin County, Alabama
approximately 2.4 miles East of the city limits of Mobile, Alabama
and immediately South of Big S Truck Stop with a motor vehicle
being then and there operated by Bill Williams?
4. If your answer to the preceding Interrogatory was
in the affirmative, please state if your motor vehicle was then
and there being operated by Hansell J. Vonier.
5. If your answer to the preceding Interrogatory was
in the affirmative, please state whether at said time and place,
the said Hansell J. Vonier was acting as your agent, servant or
employee and within the line and scope of his employment as such.

CHASON, STONE & CHASON

BY:


Attorneys for Plaintiff

FILED

JUL 10 1972

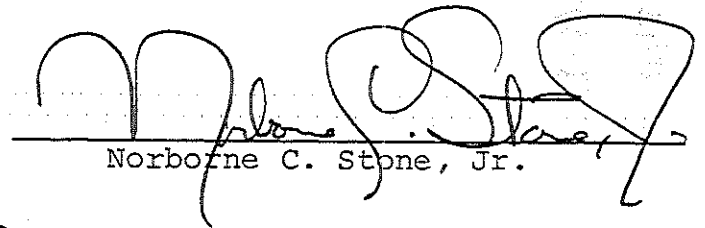
EUNICE B. BLACKMON
CIRCUIT
CLERK

STATE OF ALABAMA

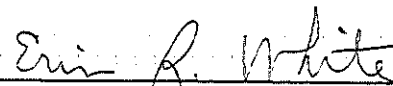
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Norborne C. Stone, Jr., who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is Norborne C. Stone, Jr. and he is one of the attorneys for the Plaintiff in the above styled cause. That the answers to the foregoing Interrogatories, if well and duly made, will be material evidence for the Plaintiff in the above styled cause.


Norborne C. Stone, Jr.

Sworn to and subscribed before
me this 10th day of July, 1972.


Notary Public, Baldwin County, Alabama

FILED

JUL 10 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

orig

CHARLES MELVIN,

Plaintiff,

VS.

J. R. LEONARD,

Defendant.

Executed this the 25th day of July,
1972 by handing a copy of within to
J.R. Leonard,

W. Walker
Sheriff, Dale Co. Ala

By: M. Amador

* * * * *

THE SHERIFF CLAIMS 25 MILES
AT 10c PER MILE FOR A TOTAL OF
\$ 2.50

W. Walker
WILLIAM WALKER, Sheriff

By _____
Deputy Sheriff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10,484

* * * * *

INTERROGATORIES PROPOUNDED
BY PLAINTIFF TO DEFENDANT

* * * * *

RECEIVED

JUL 12 1972

TAYLOR WILKINS

CHASON, STONE & CHASON

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

JOHN CHASON
NORBORNE C. STONE, JR.
JOHN EARLE CHASON
CHARLES C. PARTIN

PHONE 937-2191

May 31, 1974

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C
O
P
Y

Mr. Charles Melvin
3617 Town House Court
West Palm Beach, Florida 33407

Dear Mr. Melvin:

Re: Charles Melvin v. J. R. Leonard
Civil Action No. 10,484

We were unable to conclude an agreement with you for representation in connection with all aspects of this case, and we therefore withdraw as attorneys for you.

We have entered our withdrawal on the records of the Court and you should immediately employ counsel to represent your interest should you desire to pursue this matter.

With best regards, we are

Yours very truly,

CHASON, STONE & CHASON

By: John E. Chason

JEC:jb

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

FILED

JUN 5 1974

EUNICE B. BLACKMON
CIRCUIT
CLERK