

ARMBRECHT, JACKSON & DEMOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

TELEPHONE
AREA CODE 205
432-6751

CABLE ADDRESS
SEALAW

WM. H. ARMBRECHT
THEODORE K. JACKSON
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOK G. HOLMES
W. BOYD REEVES
FRANK B. McRIGHT
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GEOFFREY V. PARKER
WILLIAM B. HARVEY
KIRK C. SHAW
NORMAN E. WALDROP, JR.
CONRAD R. ARMBRECHT, II
A. DANNER FRAZER, JR.

April 17, 1973

Tolbert M. Brantley, Esquire
Attorney at Law
Bay Minette, Alabama 36507

Re: C. D. Phillips vs.
Johnny S. Etheridge

Dear Tolbert:

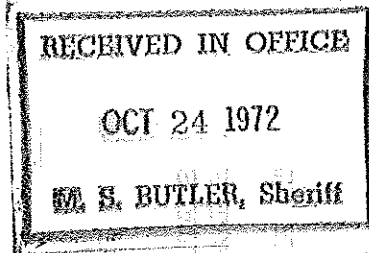
Per our recent telephone conversation, my client has agreed to settle the personal injury case (Charles W. Phillips) for \$300.00. Since Charles W. Phillips was and is a minor, I believe that a judgment should be entered to give full protection to the Defendant. To accomplish this, I enclose herewith Consolidated Underwriters' check for \$300.00 made payable to Eunice B. Blackmon to satisfy the judgment which you are authorized to have entered in the case of Charles W. Phillips vs. Steve Ethridge, Case No. 10,534. Please pay the judgment with the check and have Mrs. Blackmon send me the cost bill.

We would still like to settle the property damage case if you will become more reasonable.

Sincerely yours,


Brook G. Holmes

BGH:sh
Encl. Check #533827



CASE # 10,535

C. D. PHILLIPS

VS:

STEVE ETHRIDGE

Defendant may be served at:
Rt. 11, Inega, Georgia
Dahlonega, Georgia 30533

RECEIVED

OCT 20 1972

TAYLOR WILKINS
SHERIFF

Wilters & Brantley
Attorney for Plaintiff

Executed by serving.....copies of
the within on *M. S. Butler*
Secretary of State of The State of
Alabama.
This the *25* day of *Oct*, 19*72*

Sheriff of Montgomery County

M. S. Butler,

By *McMurtre* D. S.

M. S. Butler, Sheriff of Montgomery,
County, Alabama, Claim \$1.50 each for
serving _____ process(es) and \$1.00
travel expense on each of _____
process(es), or a total of *25.00*

McMurtre
Deputy Sheriff

FILED

NOV 6 1972

EUNICE B. BLACKMON ^{CIRCUIT}CLERK

November 2, 1972

C. D. PHILLIPS, Plaintiff
VS
STEVE ETHRIDGE, Defendant

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, AT LAW

CASE NO. 10,535

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW

I, Mabel Amos, Secretary of State, hereby certify that on October 25, 1972
I sent by certified mail in an envelope addressed as follows:

“

Steve Ethridge
Route 1
Dahlonega, Georgia 30533 ”

“Certified Mail—
Return Receipt Requested
Deliver to Addressee Only”

bearing sufficient and proper prepaid postage, a notice bearing my signature and the Great Seal of the State of Alabama in words and figures as follows:

“

Steve Ethridge
Route 1
Dahlonega, Georgia 30533

You will take notice that on October 25, 1972 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: C. D. PHILLIPS, Plaintiff VS STEVE ETHRIDGE, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 10,535 a true copy of which summons and complaint is attached hereto and the said service upon me as Secretary of State of the State of Alabama has the force and effect of personal service upon you.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 25th day of October, 1972.

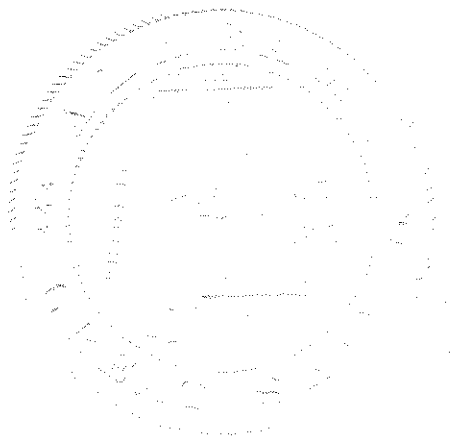
Enclosure (1)

(Signed) Mabel Amos
Secretary of State”

I further certify that the notice above set out which was so mailed in the envelope addressed as above set forth had attached to it a true copy of the summons and complaint in the above-styled cause.

I further certify that on October 30, 1972 I received the return card, showing receipt by the designated addressee of the aforementioned matter at not given on not given.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 2nd day of November, 1972.



Mabel S. Amos
MABEL S. AMOS
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

CC: Honorable L. M. Brantley
Wilters and Brantley
Court House Square
Bay Minette, Alabama 36507

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon STEVE ETHRIDGE 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 the same, then and there to answer the complaint of C. D. PHILLIPS.

WITNESS my hand this 7 day of August, 1972.

Eunice B. Blackmon
Clerk

C. D. PHILLIPS,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
STEVE ETHRIDGE,)	CASE NO. <u>10,535</u>
Defendant.)	

1.

The Plaintiff claims of the Defendant the sum of ONE THOUSAND FIVE HUNDRED DOLLARS (\$1,500.00) as damages for that, heretofore, on to-wit: the 13th day of August, 1971, the Plaintiff's automobile was being driven along or upon Highway #31, a public highway in Baldwin County, Alabama, at a point near the intersection of 31 Highway and the Phillippsville Road just South of Perdido, Alabama; at said time and place, the Defendant so negligently operated his motor vehicle as to cause the same to collide with the automobile owned by the Plaintiff. As a direct and proximate consequence and result of said negligence, the entire back end of the Plaintiff's vehicle was twisted, bent, torn and broken and the Plaintiff was left without a means of transportation for a period of three to four months, all to the loss of the Plaintiff in the aforesaid amount.

FILED

AUG 7 1972

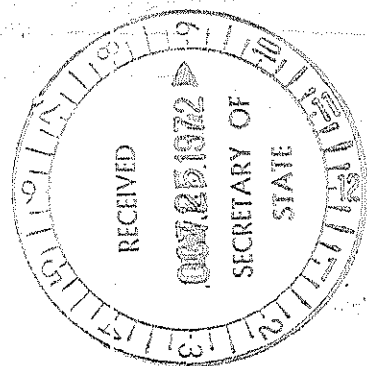
WILTERS & BRANTLEY

EUNICE B. BLACKMON CIRCUIT CLERK

BY: J M Brantley
Attorneys for the Plaintiff

Defendant may be served at

[REDACTED]
Service of process may be had upon the Secretary of State of the State of Alabama, by authority of Title 7, Section 199, Code of Alabama as recompiled in 1958.



C. D. PHILLIPS,

Plaintiff,

VS.

STEVE ETHRIDGE,

Defendant.

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA

* AT LAW

*
* CASE NO. 10,535

P L E A S

Comes now the Defendant, STEVE ETHRIDGE, and for answer to the Complaint and to each and every count thereof, separately and severally, files the following separate and several pleas:

1. Not guilty.

2. For that at the time and place complained of in Plaintiff's Complaint, the driver of Plaintiff's automobile so negligently operated the said motor vehicle on Alabama Highway #31 at or near its intersection with Phillipsville Road, both of said roads being public roads in Baldwin County, Alabama, as to cause the same to collide with the said motor vehicle being operated by the Defendant, and Defendant avers that the negligence of the driver of Plaintiff's automobile, as aforesaid, proximately contributed to Plaintiff's said injuries and damages; hence, Plaintiff cannot recover herein.

FILED

NOV 10 1972

EUNICE B. BLACKMON CIRCUIT CLERK

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Defendant.

By: Brook G. Holmes
BROOK G. HOLMES

By: Norman E. Waldrop, Jr.
NORMAN E. WALDROP, JR.

Defendant respectfully demands trial
by jury.

Brook G. Holmes
BROOK G. HOLMES

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 10th day
of November, 1972, served a copy of the
foregoing pleading on counsel for all parties to this
proceeding, by mailing the same by United States mail,
properly addressed, and first class postage prepaid.

Norman E. Waldrop, Jr.

C. D. PHILLIPS VS STEVE ETHRIDGE (10,535)

SENDER: Be sure to follow instructions on other side

PLEASE FURNISH SERVICE(S) INDICATED BY CHECKED BLOCK(S)
(Additional charges required for these services)

☐

Show to whom, date and address
where delivered

☒

Deliver ONLY
to addressee

RECEIPT

Received the numbered article described below

REGISTERED NO.

SIGNATURE OR NAME OF ADDRESSEE (Must always be filled in)

CERTIFIED NO.

50906

INSURED NO.

DATE DELIVERED

1

Steve Ethridge

2

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

Deliver to addressee only

3

SHOW WHERE DELIVERED (Only if requested, and include ZIP Code)

U.S. POSTAL SERVICE
OFFICIAL BUSINESS

PS Form 3811 Nov. 1970 c35-16-81277-1

PS Form 3811 Nov. 1970 c35-16-81277-1



Postmark of Delivering Office

RECEIVED
OCT 30 1972
SECRETARY OF STATE

SENDER INSTRUCTIONS
Print in the space below your name, address, including ZIP Code.
If special services are desired, check block(s) on other side.
Moisten gummed flap and attach to back of article.

PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE \$300

**RETURN
TO**

SECRETARY OF STATE
MONTGOMERY, ALABAMA 36104