

Ayres C. Little and Clyde Little, Partners,
d/b/a Little Motor Company, Plaintiffs

vs

Donald Lawrence Meads (Or Meade)
Et Als, Defendants

IN THE CIRCUIT COURT
OF
BALDWIN COUNTY, ALABAMA

Case No. 2237

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

I, Agnes Baggett, Secretary of State, hereby certify that on April 21, 1954, I sent by registered mail in an envelope addressed as follows:

" Donald Lawrence Meads (Or Meade)
Individually and as a Partner of
H. & M. Truck Lines
4409 Knox Street
Ft. Worth, Texas "

"Registered 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:

" Donald Lawrence Meads (Or Meade)
Individually and as a Partner of
H & M. Truck Lines
4409 Knox Street
Ft. Worth, Texas

You will take notice that on April 21, 1954 the Sheriff of Montgomery County, Alabama served upon me, in my official capacity, summons and complaint in a case entitled Ayres C. Little and Clyde Little, Partners, d/b/a/ Little Motor Company, Plaintiffs vs Donald Lawrence Meads (Or Meade) Et Als Defendants in the Circuit Court of Baldwin County, Alabama, Case No. 2237, 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 21 day of April 1954.

Enclosures - 1

Signed) Mrs. Agnes Baggett
Mrs. Agnes Baggett
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 April 27, 1954, I received the return card, showing receipt by the designated addressee of the aforementioned matter, at Fort Worth, Texas on April 23, 1954.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 27 day of April 1954.

Mrs. Agnes Baggett
Mrs. Agnes Baggett
Secretary of State

Encs. Return card and copy of
summons and complaint

MCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS
ATTORNEYS AT LAW

NINTH FLOOR, MERCHANTS NATIONAL BANK BUILDING

TELEPHONE 3-6556 P. O. BOX 1070

MOBILE 6, ALABAMA

GESSNER T. MCORVEY
DEN D. TURNER
C. M. A. ROGERS
C. A. L. JOHNSTONE, JR.
R. F. ADAMS
JAMES L. MAY, JR.
CHAUNCEY MOORE
ALEX T. HOWARD, JR.

September 1, 1954

Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

I shall appreciate it if you will file the enclosed
answer in case No. 2237 on your law docket - Little vs Hearne.

With a copy of this letter I am sending Judge
Mashburn a copy of the answer.

Very truly yours,



RFA/lgn
enclosure

CC: Judge Telfair J. Mashburn, Jr.
Bay Minette, Alabama

A M E N D E D C O M P L A I N T .

PEARL S. LITTLE,
Plaintiff,

VS.

P. E. HEARNE AND DONALD LAWRENCE
MEADS, OR DONALD LAWRENCE MEADE,
Individually, and as partners,
doing business as H & M TRUCK
LINES,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

Comes the plaintiff in the above styled cause, and, by agreement with attorney for defendants in the said cause, amends his complaint heretofore filed, by substituting PEARL S. LITTLE as party plaintiff for AYRES C. LITTLE AND CLYDE LITTLE, doing business as LITTLE MOTOR COMPANY.

Julius J. Madlbury, Jr.
Attorney for Plaintiff.

I hereby certify that I have, this 1st day March, 1955, mailed a copy of the foregoing amendment to Hon. Robert F. Adams, of Counsel for the Defendants, in a properly stamped and addressed envelope.

FILED

Julius J. Madlbury, Jr.
Attorney for Plaintiff.

March 1, 1955

ALICE J. DUCK, Clerk

A M E N D E D C O M P L A I N T .

PEARL S. LITTLE,
Plaintiff,

VS.

P. E. HEARNE AND DONALD LAWRENCE
MEADS, OR DONALD LAWRENCE MEADE,
Individually, and as partners,
doing business as H & M TRUCK
LINES,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

Comes the plaintiff in the above styled cause, and, by agreement with attorney for defendants in the said cause, amends his complaint heretofore filed, by substituting PEARL S. LITTLE as party plaintiff for AYRES C. LITTLE AND CLYDE LITTLE, doing business as LITTLE MOTOR COMPANY.

Jelfair J. Madlbury, Jr.
Attorney for Plaintiff.

I hereby certify that I have, this 1st day March, 1955, mailed a copy of the foregoing amendment to Hon. Robert F. Adams, of Counsel for the Defendants, in a properly stamped and addressed envelope.

FILED

March 1, 1955

ALICE J. DUCK, Clerk

Jelfair J. Madlbury, Jr.
Attorney for Plaintiff.

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

NO. _____

PEARL S. LITTLE,
Plaintiff,

VS.

P. E. HEARNE AND DONALD
LAWRENCE MEADE OR DONALD
LAWRENCE MEADS, Individually,
and as partners, doing busi-
ness as H & M TRUCK LINES,

Defendants.

AMENDED COMPLAINT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

PEARL S. LITTLE,

Plaintiff,

VS.

P. E. HEARNE AND DONALD
LAWRENCE MEADS OR DONALD
LAWRENCE MEADE, Individually,
and as partners, doing business
as H & M TRUCK LINES,

Defendants.

AMENDED COMPLAINT.

FILED

MAR 1 1955

ALICE J. QUICK, Clerk
J. MASHBURN
ATTORNEY AT LAW
DAHLBERG BUILDING
BAY MINETTE, ALABAMA

AYRES C. LITTLE AND CLYDE
LITTLE, PARTNERS, doing
business as LITTLE MOTOR
COMPANY,

Plaintiffs,

vs.

P. E. HEARNE AND DONALD
LAWRENCE MEADS, OR DONALD
LAWRENCE MEADE, Individually,
and as partners, doing business
as H. & M. Truck Lines,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2237

Come the Defendants and for answer to Plaintiff Pearl
S. Little's complaint as amended, separately and severally
file the following separate and several pleas:

1. Not guilty.
2. The allegations of the complaint are untrue.
3. The plaintiff was herself guilty of negligence at
the time and place complained of in the complaint which proxi-
mately contributed to her injury and damage, wherefore she
cannot recover.

MCCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS

BY:

[Signature]
Attorneys for Defendants

*Service of the above pleas is
hereby accepted.*

FILED

March 3, 1955

ALICE J. DUCK, Clerk

*Joseph J. Madaleno Jr.
Attorney for Plaintiff.*

2251

mem

FILED

MAR 3 1955

ALICE J. BUCK, Clerk

MC CORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS

ATTORNEYS AT LAW

NINTH FLOOR, MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

AYRES C. LITTLE AND CLYDE LITTLE,
PARTNERS, doing business as
LITTLE MOTOR COMPANY,

Plaintiffs,

VS.

P. E. HEARNE AND DONALD LAWRENCE
MEADS, OR DONALD LAWRENCE MEADE,
Individually, and as partners
doing business as H & M TRUCK
LINES,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

No. 2237

Come the Defendants in the above styled cause
and for answer to Plaintiffs' complaint, file, separately and
severally, the following separate and several pleas:

1. Not guilty.
2. The allegations of the complaint are untrue.

FILED

Sept. 2, 1954

ALICE J. CUCK, Clerk

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS

By:

V. J. Adams

Attorneys for Defendants

FILED

SEP 2 1954

ALICE J. DUCK, Clerk
MC CRAWLEY, TURNER, ROGERS, JOHNSTONE & ADAMS
ATTORNEYS AT LAW
NINTH FLOOR, MERCHANTS NATIONAL BANK BUILDING
MOBILE, ALABAMA

No. 2237

APPEARANCE

VS.

Filed in Office

4-12, 1954

Wm. J. Wicks
Clerk