

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS
SAM W. PIPES, III
WALTER M. COOK

2522

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama


Re: T. D. Phillips vs. Patricia Murphy, et al
Case No. 2427

Dear Mrs. Duck:

Enclosed please find check in the sum of \$14.45 covering court costs for which we ask you kindly let us have a letter stating that the case has been dismissed and court costs paid.

Very truly yours,

LYONS, PIPES AND COOK


Walter M. Cook

WMC:mg

Enc.

GORDON & JANSEN
ATTORNEYS AT LAW

1607-1610 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.
OF COUNSEL:
ROBERT E. GORDON
1325 DAUPHIN STREET

September 29, 1955

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

RE: T. D. Phillips vs. Patricia Murphy, et al.
Case No. 2527

Dear Mrs. Duck:

We will greatly appreciate your dismissing the above styled action, in which we represent the Plaintiff, on motion of the Plaintiff, taxing the costs of court against the defendants.

Your bill covering the costs of court should be mailed to Mr. Walter M. Cook, First National Bank Building, Mobile, Alabama.

Very truly yours,

GORDON & JANSEN



VRJjr/pjb

cc: Mr. Walter M. Cook
Messrs. Lyons, Pipes & Cook
Attorneys at Law
First National Bank Building
Mobile, Alabama

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS
SAM W. PIPES, III
WALTER M. COOK

August 29, 1955

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: T. D. Phillips vs. Patricia Murphy, et al
Case No. 2527

Dear Mrs. Duck:

An agreement of settlement has been reached in this case
and please advise us the amount of the court costs through
a dismissal.

Very truly yours,

LYONS, PIPES AND COOK

Walter M. Cook
mg

Walter M. Cook

WMC:mg

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS
SAM W. PIPES, III
WALTER M. COOK

June 14, 1955

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Case No. 2527
T. D. Phillips vs. Patricia Murphy

Dear Mrs. Duck:


In order to avoid the necessity of the plaintiff's attorney and ourselves making a trip to Bay Minette, would you be so kind as to suggest to Judge Hall that we are agreeable that the demurrers be submitted provided, of course, this meets with his approval.

I have only two other cases in your Court. One is a jury case, Craig vs. Coleman (#2528) which apparently will not come up until some time next fall, and the other case is a compensation case, Anderson vs. Bacon-McMillan Veneer Mfg. Co. (#2542) in which case the plaintiff's attorneys and ourselves are negotiating toward dismissal of the case.

With best wishes, we are

Very truly yours,

LYONS, PIPES AND COOK


Walter M. Cook

WMC:mg

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.

GORDON & JANSEN
ATTORNEYS AT LAW
1607-1610 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

March 8, 1955

Mrs. Alice J. Duck, clerk
Circuit Court Baldwin County
Bay Minette, Alabama

Re: T. D. Phillips vs. Patricia Murphy

Dear Mrs. Duck:

We have received a copy of Mr. Cook's demurrer to our complaint filed in the above captioned matter. Please let us know when this demurrer is set down for a hearing as we are very anxious to bring this matter to a trial.

Very truly yours,

GORDON & JANSEN

BY: 

VRJjr/alm

CC: Mr. Walter M. Cook
Attorney at Law
First National Bank Bldg.
Mobile, Alabama

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.

GORDON & JANSEN
ATTORNEYS AT LAW
1607-1610 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

May 2, 1955

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

RE: T.D. Phillips vs. Patricia Murphy, et al
Case No. 2527

Dear Mrs. Duck:

Mr. Walter Cook, attorney for the defendants said that he would write a letter to Judge Hall asking that demurrers which he filed in this cause be submitted by agreement between the parties. If this has not been done, will you please see that the demurrers are submitted to Judge Hall for a ruling, and we would like some indication of when the next term of court will be held at which this case could be tried.

Very truly yours,

GORDON & JANSEN

BY 

VRJjr/alm

GORDON & JANSEN

ATTORNEYS AT LAW

1607-1610 MERCHANTS NATIONAL BANK BUILDING

MOBILE 11, ALABAMA

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.

OF COUNSEL:
ROBERT E. GORDON
1325 DAUPHIN STREET

January 28, 1955

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

Dear Mrs. Duck:

We enclose herewith original and two copies of complaint and summons to be filed in your court. Please acknowledge receipt of these papers and advise us as of the date of service as to each defendant as soon as the Sheriff makes his return to you.

Your continuing assistance and cooperation is greatly appreciated in such matters.

Very truly yours,

GORDON & JANSEN

BY: 

VRJjr/pjb
Encls.

LYONS, PIPES AND COOK

516-519 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS
SAM W. PIPES, III
WALTER M. COOK

March 1, 1955

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

Re: J. E. Willis & John M. Wiley
d/b/a A. & A. Welding Shop vs
Bobby Phillips and/or T. D. Phillips
Our File: C12,020

Dear Mrs. Duck:

Enclosed please find appearance and demurrer
to be filed in this case and we ask that you
acknowledge same.

Very truly yours,

LYONS, PIPES AND COOK


Walter M. Cook

WMC/mh

LYONS, PIPES AND COOK

516-519 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

JOSEPH H. LYONS
SAM W. PIPES, III
WALTER M. COOK

March 1, 1955

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

Re: J. E. Willis & John M. Wiley
d/b/a A. & A. Welding Shop vs
Bobby Phillips and/or T. D. Phillips
Our File: C12,020

Dear Mrs. Duck:

Enclosed please find appearance and demurrer
to be filed in this case and we ask that you
acknowledge same.

Very truly yours,

LYONS, PIPES AND COOK


Walter M. Cook

WMC/mh

T. D. PHILLIPS,
Plaintiff,

-vs-

PATRICIA MURPHY and
J. E. WILLIS, jointly
and severally,

Defendants.

) IN THE CIRCUIT COURT

) OF BALDWIN COUNTY,

) ALABAMA.

) AT LAW.

) CASE NO. 2527

Comes now the Plaintiff in the above entitled cause, and propounds the following interrogatories to the defendant, Patricia Murphy:

1. Please state your name and address. (b) What is your age? (c) What was your age on the 6th day of February, 1954? (d) Please state whether at that time you held a license to operate a motor vehicle over and upon the highways of the State of Alabama. If so, please state the number of that license and the date on which it was issued to you.

2. Please state whether you were involved in an automobile accident on or about the 6th day of February, 1954 on Alabama Highway 3 South of Foley, Baldwin County, Alabama. (b) Were you riding in an automobile at the time of the accident? (c) Who was driving that automobile in which you were riding? (d) Who else was riding in that vehicle? (e) Who was the owner of that vehicle at the time of the accident? (f) How long had you had the vehicle? (g) Please state whether the person whom you state owned the vehicle, knew that the automobile was in your custody, and, if so, whether he gave you permission to use his vehicle.

3. If you state in the preceding interrogatories that you were involved in an automobile accident on or about the 6th day of February, 1954 on Alabama Highway 3 at a point in Baldwin County south of Foley, and if you state that you were driving a vehicle which was involved in that collision, please state the time of day and the day of the week on which this accident occurred. (b) Please state, as definitely as possible, the location of the collision with respect to other towns, places of business, or intersections. (c) Please state the number of vehicles involved in the collision. (d) If you

state that there was another vehicle involved in the collision, please state the number of persons riding in that vehicle and the make or model of it.

4. In what direction was the vehicle in which you were riding travelling immediately prior to the collision? (b) In what direction was the other vehicle travelling immediately prior to the collision.

5. Was either vehicle on the wrong, left, or improper side of the road. (b) If you state that there was another vehicle involved in the collision and that it was being driven in the same direction that you were travelling, please state your distance from that vehicle when you first saw it. (c) Were there any lights burning on that vehicle? (d) If so, describe them. (e) What, in your opinion, was the speed of that vehicle at the time you first saw it, and what, in your opinion, was the speed of your vehicle at the time that you first observed the other vehicle?

6. Where had you been immediately prior to the collision and where were you going at the time of the collision?

7. What beverages had you consumed within the four hour period immediately prior to this collision.

8. What part of the automobile in which you were travelling was damaged in the collision, and what part of the automobile with which your automobile collided was damaged in the collision?

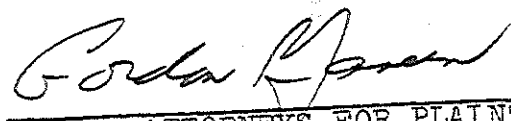
9. What happened to the automobile with which your automobile collided, immediately after the impact. (b) What happened to your automobile, on which side of the roadway did it come to rest, and at what distance from the point of impact did it come to rest?

10. Please state whether the local police, Alabama Highway Patrol, or any law enforcement agency made an investigation of this accident. If so, please state what agencies and the name or names of the officer or officers who investigated.

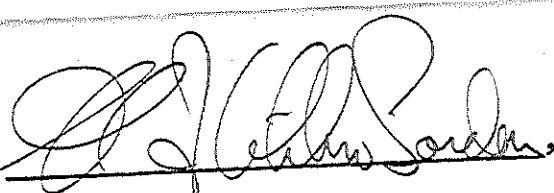
11. If you state in answer to interrogatory 8 above that your automobile collided with the rear portion of the other automobile

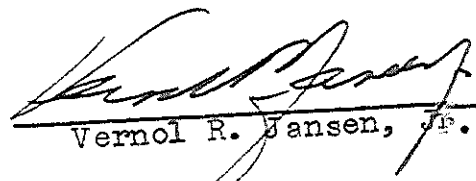
and if you stated in answer to interrogatory 5(a) above that neither car was on the wrong side of the roadway, please state what effort you made to avoid colliding with the automobile which you were overtaking. (b) Did you turn to the left? If you state that you did not turn to the left, please state whether there was any vehicular traffic moving toward you in the south lane of the roadway at the time you overtook the vehicle with which you collided.

12. For purposes of qualifying the jury which may be impanelled to try the issues in this cause, please state the name and address of the liability insurance company with whom you, or the owner of this vehicle, was protected by a contract of insurance.

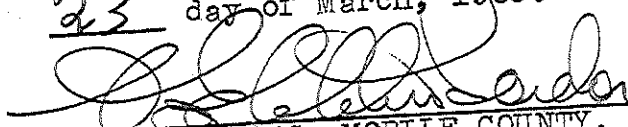

ATTORNEYS FOR PLAINTIFF

STATE OF ALABAMA)
COUNTY OF MOBILE)

Before me, , a Notary Public in and for said State and County, personally appeared Vernol R. Jansen, Jr., who is known to me, and who being by me first duly sworn, upon his oath, deposes and says, that he is one of the attorneys for the Plaintiff in the above entitled cause, and that the defendant's answers to the above and foregoing interrogatories, if well and truly made, will be material evidence for the plaintiff on the trial of said cause.


Vernol R. Jansen, Jr.

Subscribed and sworn to before me, this
23 day of March, 1955.


NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

Received in Sheriff's Office
this 25 day of Mar 1955
TAYLOR WILKINS, Sheriff

25-27

J. W. Phillips
VS
Patricia Murphy
et al.

EXECUTED

This 29 day of Mar, 1955.
by Walter Coad, Atty.
RAY E. B...
By M. R...

FILED
MAR 25 1955
ALICE L. DUCK, Clerk

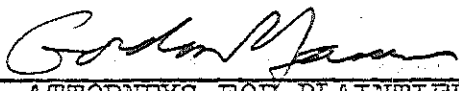
CASE NO. 25-27

Walter M. Cook

T. D. PHILLIPS,)	IN THE CIRCUIT COURT
	(
Plaintiff,)	OF BALDWIN COUNTY,
	(
-vs-)	ALABAMA.
	(
PATRICIA MURPHY and)	AT LAW.
J. E. WILLIS, jointly	(
and severally,)	
	(
Defendants.)	CASE NO. _____

COUNT ONE

Plaintiff claims of the Defendants the sum of Five Hundred (\$500.00) Dollars as damages in this, that heretofore on to-wit: the 6th day of February, 1954, the Defendant Murphy, the agent, servant or employee of the Defendant Willis, while acting within the line and scope of her employment as such, so negligently operated a motor vehicle northwardly on Highway 3 in Foley, Alabama, a public highway in Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was then being driven in a northerly direction on said Highway 3, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, and he lost the use thereof for a long period of time, all to the injury of the Plaintiff, hence this suit.



 ATTORNEYS FOR PLAINTIFF

STATE OF ALABAMA)
(
COUNTY OF BALDWIN)

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Patricia Murphy to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of T. D. Phillips.

Witness: Alice J. Duck, Clerk of said Court, this 31 day of Jan, 1955.

Attest: Alice J. Duck
Clerk.

* * * * *

SHERIFF'S RETURN

Received 4 day of Feb, 1955, and on 11 day of Feb, 1955, I served a copy of the within complaint on Patricia Murphy by service on J. E. Willis.

Nathan M. Howell
SHERIFF
R. A. Rhee Deputy

STATE OF ALABAMA)
(
COUNTY OF BALDWIN)

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. E. Willis to appear within thirty days from service of this process in the Circuit Court of Baldwin County, Alabama, at the place of holding same, then and there to answer the complaint of T. D. Phillips.

Witness: Alice J. Duck, Clerk of said Court, this 31 day of January, 1955.

Attest: Alice J. Duck

Clerk.

* * * * *

SHERIFF'S RETURN

Received 11 day of Feb, 1955, and on the 11 day of Feb, 1955, I served a copy of the within complaint on J. E. Willis by service on J. E. Willis

Walt A. McDowell
SHERIFF

R. A. Lister Deputy

Baldwin
City No 2527

J. H. Phillips
vs.

Patricia Murphy
J. E. Wilcox

8415-1000 So

Received 30 day of Jan 1955
and on 8 day of Feb 1955
I served a copy of the within
on _____

By service on Patricia Murphy

TAYLOR WILKINS, Sheriff
By Charles Williams D.

EXECUTED this the 11
day of Feb 1955
by leaving a copy of the within with

J. E. Wilcox
HOLT A. McDOWELL, Sheriff
Jefferson County, Alabama
By R. E. Galt D.S.

FILED

JAN 31 1955

ALICE L. DUCK, Clerk