

Prince E. Griffin, individually, and
d/b/a Fairhope Taxi Company, Plaintiff

VS

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

John W. Crawley, individually, Defendant

CASE NO. 2551

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

I, Mary Texas Hurt, Secretary of State, hereby certify that on March 7, 1955,
I sent by registered mail in an envelope addressed as follows:

"John W. Crawley
Lucedale, Mississippi"

"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:

"John W. Crawley
Lucedale, Mississippi

You will take notice that on March 7, 1955, the Sheriff of
Montgomery County, Alabama, served upon me, in my official
capacity, summons and complaint in a case entitled:
Prince E. Griffin, individually, and d/b/a/ Fairhope Taxi
Company, Plaintiff VS John W. Crawley, individually,
Defendant
in the Circuit Court of Baldwin County, Alabama, at Law
Case No. 2551 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 7th day of March 1955.


Enclosure (1)

(Signed) Mary Texas Hurt
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.

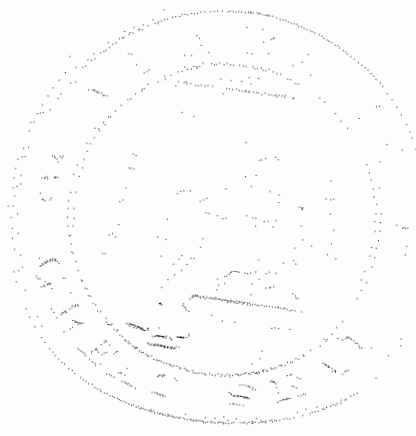
I further certify that on March 14, 1955, I received the return card,
showing receipt by the designated addressee of the aforementioned matter
at Lucedale, Mississippi on March 12, 1955.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 14 day
of March 1955.


Mary Texas Hurt
Secretary of State

Enclosures: Return Receipt Card
copy of Summons and
Complaint.

cc: Ernest M. Bailey
Attorney
Fairhope, Alabama

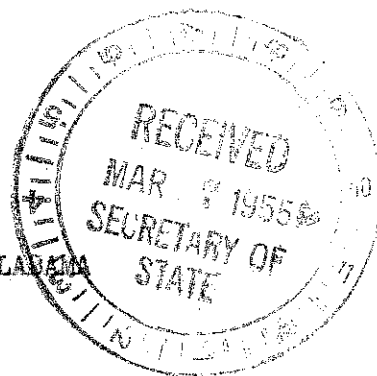


STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA



TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOHN W. CRAWLEY, individually, and J. N. CRAWLEY, Jr., individually, 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 JOHN W. CRAWLEY, individually, and J. N. CRAWLEY, Jr., individually, Defendants, by PRINCE E. GRIFFIN, individually, and d/b/a Fairhope Taxi Company, Plaintiff.

Witness my hand this 3 day of March, 1955.

Prince E. Griffin, Clerk.

John W. Crawley lives at Lucedale, Miss.
and J. N. Crawley, Jr. lives Route A,
Perkinxston, Mississippi.

PRINCE E. GRIFFIN, individually, and
d/b/a Fairhope Taxi Company
Plaintiff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

-vs-

AT LAW

JOHN W. CRAWLEY, individually, and
J. N. CRAWLEY, Jr., individually
Defendants

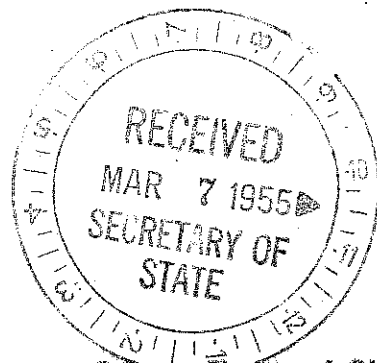
Case No. _____

COUNT ONE

The Plaintiff claims of the Defendants the sum of Four Thousand Six Hundred (\$4,600.00) Dollars as damages, for that heretofore and on to-wit: the 12th day of March, 1954, the Defendant, John W. Crawley, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant, J. N. Crawley, Jr., did so negligently operate a truck in a Southernly direction on Church Street at to-wit: a point where Church Street intersects with White Avenue, in the City of Fairhope, Baldwin County, Alabama, said road or street being a public road or street in the County of Baldwin, State of Alabama, as to cause said truck to collide with, run over, upon or against an automobile owned and operated by the Plaintiff, and as a direct and proximate consequence of said negligence of said Defendant, John W. Crawley, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant, J. N. Crawley, Jr., the Plaintiff's automobile was bent, broken, damaged and otherwise destroyed and he was caused to lose the use of said automobile from the date of said accident to the date of the filing of this Bill of Complaint, all as a proximate consequence of the said negligence of the Defendant, John W. Crawley, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant, J. N. Crawley, Jr., to the damage of the Plaintiff in the aforesaid

amount, hence this suit.

COUNT TWO



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1-22
The Plaintiff claims of the Defendants the sum of Four Thousand Six Hundred (\$4,600.00) Dollars as damages, for that heretofore and on to-wit: the 12th day of March, 1954, the Defendant, John W. Crawley, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant, J. W. Crawley, Jr., while driving a truck in a Southernly direction on a public road or street commonly known as Church Street, said public road or street being in the County of Baldwin, State of Alabama, at to-wit: a point where Church Street intersects with White Avenue in the City of Fairhope, Baldwin County, Alabama, did willfully or wantonly drive said truck over, upon or against an automobile then and there owned and operated by the Plaintiff, and as a direct and proximate consequence of the said willful and wanton act on the part of the Defendant, John W. Crawley, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant J. W. Crawley, Jr., the Plaintiff's automobile was bent, broken, damaged and otherwise destroyed and he was caused to lose the use of said automobile from the date of said accident to the date of the filing of this Bill of Complaint, all as a proximate consequence of the said willful and wanton act on the part of the Defendant, John W. Crawley, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant J. W. Crawley, Jr., to the damage of the Plaintiff in the aforesaid amount, hence this suit.

Emmett M. Bailey
Attorney for Plaintiff

PLAINTIFF DEMANDS TRIAL BY JURY:

Emmett M. Bailey
Attorney for Plaintiff

Prince E. Griffin, individually, and
d/b/a Fairhope Taxi Company, Plaintiff

VS

John W. Crawley, individually, Defendant

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