

REC. IN. \_\_\_\_\_CORD NO. \_\_\_\_\_

OR

ORDER NO. \_\_\_\_\_

DELIVERY TICKET NO. \_\_\_\_\_

INVOICE

A. A. RICHARDS & CO., INC.

OFFICE AND QUICK FREEZERS LOCATED IN THE  
COLD STORAGE PLANT AT ALABAMA STATE DOCKS

TELEPHONE 2-0320

P. O. BOX 318

MOBILE, ALABAMA

Nº 1527

ACCOUNT OF

Gulf Lagoon Fish Company  
Gulf Shores, Alabama

LOT NO. \_\_\_\_\_

DATE June 3, 19 54

FOR U-DRIVE-IT-TRUCK: May 29, 1954.....Tractor & Trailer

Invoice #45750 attached

5/29/54.....U-Drive\*It-Truck.....\$37.30

TOTAL

\$37.30

*paid*  
*6/4*  
*AL# 2810*  
*AL# 2810*

RECEIVING RECORD NO. \_\_\_\_\_

OR \_\_\_\_\_

ORDER NO. \_\_\_\_\_

DELIVERY TICKET NO. \_\_\_\_\_

INVOICE

A. A. RICHARDS & CO., INC.

OFFICE AND QUICK FREEZERS LOCATED IN THE  
COLD STORAGE PLANT AT ALABAMA STATE DOCKS

TELEPHONE 2-0320

P. O. BOX 318

MOBILE, ALABAMA

Nº 1519

ACCOUNT OF

Gulf Lagoon Fish Company  
Gulf Shores, Alabama

LOT NO. U-Drive-It-Trucks

DATE June 2, 19 54

FOR U-DRIVE-IT\*TRUCKS

Invoices Attached

5/21/54.....# 45656.....\$20.44

5/27/54.....# 45718.....21.76

TOTAL

\$42.20

Paid by A. A. Richards and Company

*Paid*  
*6/4*  
*ck # 2809*  
*pts Ex 2*

RECEIVING RECORD NO. \_\_\_\_\_

OR

ORDER NO. \_\_\_\_\_

DELIVERY TICKET NO. \_\_\_\_\_

OFFICE

# A. A. RICHARDS & CO., INC.

OFFICE AND QUICK FREEZERS LOCATED IN THE  
COLD STORAGE PLANT AT ALABAMA STATE DOCKS

TELEPHONE 2-0320

P. O. BOX 318

Nº 1475

MOBILE, ALABAMA

ACCOUNT OF

Gulf Lagoon Fisheries  
Gulf Shores, Alabama

LOT NO. For U-Drive-It Truck

DATE May 18, 19 54

FOR U-DRIVE-IT TRUCK

May 13, 1954.....Invoice Attached.....\$20.03~~XX~~

May 15, 1954.....".....16.28

TOTAL \$36.31

*AA. Richards*

*5/19  
d # 2763*

*Ref to Exp 1*

LEE CALLAWAY, Doing business  
under the firm name and style  
of Gulf-Lagoon Fish Company,

Plaintiff,

VS.

DOROTHY BARNETT, Formerly known  
as Dorothy Bianchi, as Executrix  
of the Estate of Paul Bianchi,  
Deceased,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. 2557

AMENDED PLEAS.

Comes the defendant in the above styled cause, by her attorney, Telfair J. Mashburn, Jr., and, amends her pleas heretofore filed in this cause, so that, as amended, they are as follows:

1.

The allegations of the complaint are untrue.

2.

The plaintiff at the time and place complained of in said complaint, acting by and through his agent, servant, or employee, Charles M. Moore, who was then and there acting within the line and scope of his employment as such, was himself guilty of negligence which proximately contributed to his damages in that he negligently drove the automotive truck, which he was then and there driving, into, over or against the automobile which was then and there being driven by defendant's intestate.

Telfair J. Mashburn, Jr.  
Attorney for Defendant.

LEE CALLAWAY, Doing business  
under the firm name and style  
of Gulf-Lagoon Fish Company,

Plaintiff,

VS.

DOROTHY BARNETT, Formerly known  
as Dorothy Bianchi, as Executrix  
of the Estate of Paul Bianchi,  
Deceased,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. \_\_\_\_\_

P L E A S .

Comes the defendant in the above styled cause, by her  
attorney, Telfair J. Mashburn, Jr., and, for the answer to  
the complaint heretofore filed in said cause, says:

1.

That the allegations of the complaint are untrue.

2.

That the plaintiff, at the time and place complained of  
in said complaint, acting by and through his agent, servant,  
or employee, Charles M. Moore, who was then and there acting  
within the line and scope of his employment as such, was him-  
self guilty of negligence which proximately contributed to his  
damages.

Telfair J. Mashburn, Jr.  
Attorney for Defendant.

STATE OF ALABAMA)  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Dorothy Barnett, formerly known as Dorothy Bianchi, as Executrix of the Estate of Paul Bianchi, Deceased, 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 Lee Callaway, Doing business under the firm name and style of Gulf-Lagoon Fish Company.

Witness my hand this 17<sup>th</sup> day of March, 1955.

*Archie L. Newkirk*  
Clerk.

LEE CALLAWAY, Doing business  
under the firm name and style  
of Gulf-Lagoon Fish Company,

Plaintiff,

vs.

DOROTHY BARNETT, Formerly known  
as Dorothy Bianchi, as Executrix  
of the Estate of Paul Bianchi, De-  
ceased,

Defendant.

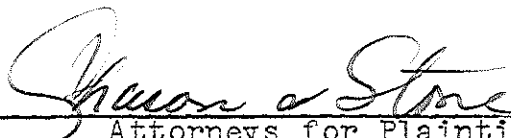
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW


COUNT ONE:

The Plaintiff claims of the Defendant the sum of Two Thousand and 81/100 Dollars (\$2000.81) as damages for that, on to-wit, May 3, 1954, at about 8:30 o'clock a.m. the Defendant's testate, Paul Bianchi, negligently drove an automobile into, upon or against an automotive truck owned by the Plaintiff, at the intersection of Greeno Road and Fairhope Avenue, in Fairhope, Alabama, said collision occurring on a public highway in Baldwin County, Alabama, and as a proximate result of the negligence of the Defendant's testate, Paul Bianchi, the Plaintiff's said truck was damaged in this: its hood, grill, right front fender, right door, cab, and right side of truck body was bent, and badly broken; its engine was damaged and its frame

was bent and its right head light was broken. Plaintiff further avers that at the time of said collision his truck was loaded with fish known as snappers, which were the property of the Plaintiff and which were of the reasonable market value of Five Hundred Eighty-five Dollars (\$585.00), which said fish were damaged in the collision to such an extent that they were rendered unfit for human consumption. Plaintiff further avers that his truck was being used in his business and he was caused to lose the use of such truck for approximately thirty (30) days and during said period of time it was necessary that he rent U-Drive-It trucks to haul his products and Plaintiff further avers that the negligence of the Defendant's testate, Paul Bianchi, was the proximate cause of the damages to the Plaintiff as above set out, hence this suit.

  
Attorneys for Plaintiff.

Plaintiff demands a trial of this cause by a jury.

  
Attorneys for Plaintiff.

Received at Sheriff's Office  
this 7 day of APR 55  
TAYLOR WATKINS, Sheriff

Use the money for the  
Plaintiff in address damage  
of (1840.00) lighters, hundred  
forty and no 100 Dollars.

R.D. Constock, Town

EXECUTED  
This 10th day of March, 1955  
by serving a copy of the within on  
Dorothy Barnett  
RAY D. BRIDGES, Sheriff  
By R. L. Matthews

NO 2557 392  
1174

SUMMONS AND COMPLAINT

RECORDED

LEE CALLAWAY, Doing business under  
the firm name and style of Gulf-  
Lagoon Fish Company,

Plaintiff,

10x  
m vs.

DOROTHY BARNETT, Formerly known  
as Dorothy Bianchi, as Executrix  
of the Estate of Paul Bianchi,  
Deceased,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

Filed this 7th day of March, 1955.

W. C. F. F. F.  
Clerk.

LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA