

JOHNSTON, McCALL & JOHNSTON
LAWYERS
EIGHTH FLOOR FIRST NATIONAL BANK ANNEX
MOBILE, ALABAMA

SAMUEL M. JOHNSTON
DAN T. McCALL, JR.
WILLIAM E. JOHNSTON
SAMUEL M. JOHNSTON, JR.
PERCY W. JOHNSTON, JR.

July 20, 1955

MAILING ADDRESS:
P. O. BOX 550
MOBILE 4, ALABAMA

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

Dear Mrs. Duck:

Please find enclosed herewith the original and a copy of a summons and complaint in the case of Roscoe Brickhouse, Plaintiff, vs. Paul E. Thompson, Defendant. After executing the summons, please mark these papers filed and deliver them to your sheriff for service of process on the defendant. The defendant's address is 120 Lyle Street, East Brewton, Alabama. He will be at this address on next Saturday, July 23rd. Please request Mr. Taylor Wilkins, your Sheriff, to forward the papers as soon as possible to the Sheriff of Escambia County, Alabama, with advice about the defendant's address and the importance of serving him next Saturday.

Very truly yours,


Dan T. McCall, Jr.

DTM, jr/lgf

Encls.

cc: Mr. Philip D. Beall
Lt. Comdr. R. S. McKnight, Jr.

ROSCOE BRICKHOUSE,

Plaintiff,

VS.

PAUL E. THOMPSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

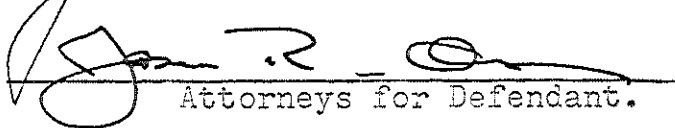
AT LAW

NO. 2669

PLEA

Now comes the Defendant in the above styled cause and
for plea to the Complaint heretofore filed in said cause says:

1. Not guilty.



Attorneys for Defendant.

ROSCOE BRICKHOUSE,	)	
	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
	)	AT LAW
PAUL E. THOMPSON,	)	NO. 2669
Defendant.	)	

NOTICE

Pursuant to the provisions of Act Number 375 enacted by the Legislature of Alabama and approved September 8, 1955 (General Acts of Alabama, 1955 Session, Volume 2, pages 901-7), notice is hereby given that the defendant desires to take the testimony of the plaintiff by deposition upon oral examination for the purpose of discovery or for the use as evidence in the action or for both purposes.

Notice is further given that the said testimony will be taken in the office of Philip D. Beall, Attorney at Law, Florida National Bank Building, Pensacola, Florida at two o'clock P. M. on March 8, 1956.

J. B. Blackburn

James R. Quinn

Attorneys for defendant.

I hereby certify that I delivered a copy of the foregoing notice to Dan T. McCall, Jr., Esquire, one of the attorneys for the plaintiff, on this the 23 day of February, 1956.

J. B. Blackburn

Of counsel for defendant.

ROSCOE BRICKHOUSE,)
Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
PAUL E. THOMPSON,) AT LAW NO. 2669
Defendant.)

MOTION TO REQUIRE SECURITY FOR
COSTS

Now comes the defendant and shows unto the court that plaintiff is a non-resident of the State of Alabama and that he has not deposited or secured the court costs to be incurred in this proceeding.

WHEREFORE, defendant moves the court to require the said plaintiff to deposit or secure the costs of this proceeding, or dismiss it.

L. B. Blachman

James R. O...

Attorneys for defendant.

ROSCOE BRICKHOUSE, | IN THE CIRCUIT COURT OF
 |
 | Plaintiff, |
 |
vs. | BALDWIN COUNTY, ALABAMA.
 |
PAUL E. THOMPSON, |
 |
 | Defendant. | AT LAW. NO. _____

COUNT ONE

Plaintiff claims of the defendant the sum of FIFTEEN THOUSAND and no/100 (\$15,000.00) DOLLARS as damages for that on, to-wit, the 26th day of April, 1955, the defendant wantonly injured the plaintiff by so wantonly operating an automobile over, along and upon U. S. Highway 90 Truck Route at or near its intersection with U. S. Highway 31 at a point approximately 2.5 miles North of Spanish Fort in Baldwin County, Alabama, as to cause said automobile to leave the traveled portion of the roadway and collide with a tree, as a proximate result of which wantonness the plaintiff, who was then and there riding in said automobile being driven by the defendant, was seriously and permanently injured: his right leg was broken and his right foot painfully injured, his back was sprained, his face and body was badly cut and bruised, he was required to be hospitalized and undergo medical treatment for a long period of time, and has suffered permanent injury on account of his said injuries, and plaintiff was made sick and sore and suffered great physical pain and mental anguish and will continue to suffer pain in the future, all on account of the wantonness of the defendant as aforesaid; wherefore, plaintiff brings this action and asks judgment in the above sum.

Johnston McCall + John McCall
Philip D. Beale
Plaintiff demands a trial by jury in the above entitled cause.

Defendant's Address is:
120 Lyle Street
East Brewton, Alabama

The State of Alabama

~~MOBILE~~ COUNTY
BALDWIN

CIRCUIT COURT

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon

Paul E. Thompson, defendant

to appear within thirty days from service of this process, in the Circuit Court of Baldwin ~~Mobile~~ County,
Alabama, at the place of holding the same, then and there to answer the complaint of
Roscoe Brickhouse, plaintiff

Alice J. Duck

WITNESS: ~~John E. Mandeville~~, Clerk of said Court, this 21 day of July, 1955

Attest: Alice J. Duck
Clerk

SHERIFF'S RETURN

Received Day of , 19 , and on Day
of , 19 , I served a copy of
the within on

by service on

~~W. H. HOLCOMBE~~, SHERIFF

By D. S.