

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

March 28, 1956

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

Dear Mrs. Duck:

The case of Albert J. Lee vs. J. F. Bevis, case number 2871 has been settled between the parties and I will appreciate it if you will have this case dismissed for me.

Yours very truly,


JAMES R. OWEN

JRO/ers

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March 28, 1956

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

Dear Mrs. Duck:

The case of Willis E. Goram vs. J. F. Bevis,
case number 2870 has been settled between the parties and
I will appreciate it if you will have this case dismissed
for me.

Yours very truly,



JAMES R. OWEN

JRO/ers

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. F. Bevis, Sr., and James Frank Bevis, Jr., 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 the same, then and there to answer the complaint of Albert J. Lee.

WITNESS my hand this 2 day of March, 1956.

Alice J. Duck
Clerk.

Defendants' addresses are 428 Haralson Avenue, Gadsden, Alabama.

* * * * *

ALBERT J. LEE,

Plaintiff,

VS.

J. F. BEVIS, SR., and JAMES
FRANK BEVIS, JR.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

COUNT ONE

Plaintiff claims of the Defendants Ten Thousand Dollars (\$10,000.00) for that on, to-wit: October 28, 1955, the Defendant, James Frank Bevis, Jr., who was then and there an agent, servant or employee of the Defendant, J. F. Bevis, Sr., acting within the line and scope of his authority as such agent, servant or employee, negligently drove an automobile into an automobile in which the Plaintiff was riding, on United States Highway No. 31, at a point 9.1 miles North of the Courthouse square of Bay Minette, Alabama, and as a proximate result of said negligence on the part of the Defendant, James Frank Bevis, Jr., the agent, servant or employee of the Defendant, J. F. Bevis, Sr., who was then and there acting within the line and scope of his authority as such agent, servant or employee, the Plaintiff was seriously and permanently injured,

and caused to suffer great pain and to incur large expenses by way of doctors bills, hospital bills and medicine, and was caused to lose a great deal of time from his occupation or work, all to his damage as aforesaid. Plaintiff further alleges that he was injured and damaged as follows: His head, eye and other parts of his body were lacerated and bruised, strained and injured, he was permanently injured, his nervous system was greatly shocked and impaired, he was made sick and sore for a long period of time, his physical stamina was impaired and permanently impaired, he was caused to suffer great physical pain and mental anguish, was put to much trouble, annoyance, inconvenience, and loss of time in and about an effort to heal and cure his said wounds and injuries.


Attorney for Plaintiff?

Plaintiff demands a trial of said cause by jury.


Attorney for Plaintiff.