

2908

ROBERT LEE PARKER

PLAINTIFF

VS

THOMAS MEEKS and ERNEST P.
MEEKS

DEFENDANTS

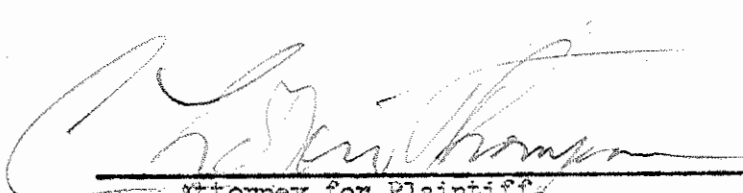
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. ~~2675~~ 2908

Plaintiff claims of the Defendants the sum of Six Hundred (\$600.00) Dollars as damages, in this that heretofore on to-wit; 24th day of April, 1955 the Defendants while engaged in a joint venture, and that Ernest P. Meeks while so engaged, so negligently operated a motor vehicle southwardly on Moran Street, near its intersection with Saw Mill Road, both of which are public streets in Bay Minette, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was being driven in a southerly direction on said Moran Street, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, all to the injury of the Plaintiff, hence this suit.


Attorney for Plaintiff.

ROBERT LEE PARKER

PLAINTIFF

VS

THOMAS WEEKS and ERNEST P.
WEEKS

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. ~~25~~ 2908

Plaintiff claims of the Defendants the sum of Six Hundred (\$600.00) Dollars as damages, in this that heretofore on to-wit; 24th day of April, 1955 the Defendants while engaged in a joint venture, and that Ernest P. Weeks while so engaged, so negligently operated a motor vehicle southwardly on Moran Street, near its intersection with Saw Mill Road, both of which are public streets in Bay Minette, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was being driven in a southerly direction on said Moran Street, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, all to the injury of the Plaintiff, hence this suit.


Attorney for Plaintiff.

ROBERT LEE PARKER,
Plaintiff,

VS.

THOMAS MEEKS AND ERNEST P. MEEKS,
Defendants,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA

CASE NO. 2908

MOTION TO QUASH SERVICE

Comes now the defendant, Thomas Meeks, and appearing specially and only for the purpose of making this motion and no other, and without waiving proper service, moves the court to quash and vacate the service in the above entitled cause made by the Sheriff of Montgomery County, Alabama upon the Secretary of State, State of Alabama, on, to-wit, April 27, 1956 as agent of said defendant as a non-resident of the State of Alabama under Title 7 Section 199 Code of Alabama (1940) and for grounds of said motion, this defendant says, that at the time the alleged cause of action sued on arose, to-wit, the 24th day of April, 1955, he was not a non-resident of the State of Alabama but was a resident of Baldwin County, Alabama.

THOMAS F. PARKER

By: J. T. Salmon
Attorney for Thomas Meeks

I hereby certify that I have this 20 day of June, 1956 mailed a copy of the foregoing motion to quash service, postage prepaid, to C. Le Noir Thompson, Bay Minette, Alabama, Attorney of Record for Plaintiff.

THOMAS F. PARKER

J. T. Salmon
Attorney for Thomas Meeks

ROBERT LEE PARKER - Plaintiff

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

VS.

THOMAS MEEKS and ERNEST P. MEEKS - Defendants

CASE NO. 2908

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

I, Mary Texas Hurt, Secretary of State, hereby certify that on April 27, 1956
I sent by registered mail in an envelope addressed as follows:

"Mr. Thomas Meeks
775 Union Street
Springfield, Massachusetts"

"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:

"Mr. Thomas Meeks
775 Union Street
Springfield, Massachusetts

You will take notice that on April 27, 1956 the Sheriff of
Montgomery County, Alabama, served upon me, in my official capacity, Summons and
Complaint in a case entitled: ROBERT LEE PARKER, Plaintiff VS THOMAS MEEKS and
ERNEST P. MEEKS, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 2908 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 27th
day of April 1956.

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 May 4, 1956 I received the
return card, showing receipt by the designated addressee of the aforementioned matter
at Springfield, Mass. on 5/1/56

WITNESS MY HAND and the Great Seal of the State of Alabama this the 8 day
of May 1956

Mary Texas Hurt
Mary Texas Hurt
Secretary of State

Enclosures: Return Receipt Card and
copy of Summons and
Complaint.

cc: Honorable C. LeNoir Thompson
Attorney at Law
Bay Minette, Alabama

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2900

April TERM, 19 56

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

THOMAS MEERS AND ERNEST P. MEERS, 775 Union Street, Springfield,
Massachusetts;

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 THOMAS MEERS AND
ERNEST P. MEERS, 775 Union Street, Springfield, Mass.
_____, Defendant____

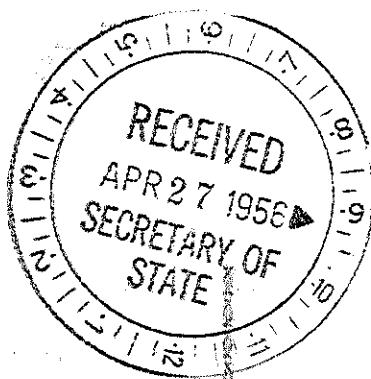
by ROBERT LEE PARKER

_____, Plaintiff____

Witness my hand this 23rd. day of April 19 56

Alice J. Duck
ALICE J. DUCK

_____, Clerk



ROBERT LEE PARKER
PLAINTIFF

VS

THOMAS MECKE AND ERNEST P.
MECKE

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. 2908

1.

Plaintiff claims of the Defendants the sum of Six Hundred (\$600.00) Dollars as damages, in this that heretofore on to-wit; 24th day of April, 1955 the Defendants while engaged in a joint venture, and that Ernest P. Mecke while so engaged, so negligently operated a motor vehicle southwardly on Moran Street, near its intersection with Saw Mill Road, both of which are public streets in Bay Minette, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was being driven in a southerly direction on said Moran Street, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, all to the injury of the Plaintiff, hence this suit.


AND Plaintiff further avers that the Defendants, Thomas Mecke is in Springfield, Massachusetts, his address being 775 Union Street, Springfield, Massachusetts; and that the defendant Ernest P. Mecke resides in Springfield, Massachusetts; his address being 775 Union Street, Springfield, Massachusetts; and that the said Defendants are and were on the date of said collision, to-wit: 24th day of April, 1955 residing as stated and that the said Thomas Mecke and Ernest P. Mecke were non-residents of the State of Alabama on said date and that the present post office address of said non-resident defendants are as follows:

Thomas Mecke, 775 Union Street, Springfield, Massachusetts,
Ernest P. Mecke, 775 Union Street, Springfield, Massachusetts.

AND Plaintiff prays that the service of process upon the non-resident defendants named herein may be had in accordance with the provisions of the 1940 Code of Alabama, Title 7, Section 199, as amended.


Attorney for Plaintiff.

Plaintiff demands a trial by jury.


Attorney for Plaintiff.

ROBERT LEE PARKER - Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS.

THOMAS MEEKS and ERNEST P. MEEKS - Defendants

CASE NO. 2908

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, at law

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

April 27, 1956

"Mr. Ernest P. Meeks
775 Union Street
Springfield, Massachusetts"

"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:

"Mr. Ernest P. Meeks
775 Union Street
Springfield, Massachusetts

You will take notice that on April 27, 1956 the Sheriff of
Montgomery County, Alabama, served upon me, in my official capacity, Summons and
Complaint in a case entitled: ROBERT LEE PARKER, Plaintiff VS Thomas Meeks and
Ernest P. Meeks, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 2908 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 27th
day of April, 1956

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-
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I further certify that on May 4, 1956 I received the
return card, showing receipt by the designated addressee of the aforementioned matter
at Springfield, Mass. on 5/1/56

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of May 1956.

Mary Texas Hurt

Mary Texas Hurt
Secretary of State

Enclosures: Return Receipt Card and
copy of Summons and
Complaint.

cc: Honorable C. Lenoir Thompson
Attorney at Law
Bay Minette, Alabama

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY }

CIRCUIT COURT, BALDWIN COUNTY

No. 2908

April

TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

THOMAS MEEKS AND ERNEST P. MEEKS, 775 Union Street, Springfield,
Massachusetts;

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 ~~THOMAS MEEKS AND~~
~~ERNEST P. MEEKS, 775 Union Street, Springfield, Mass.~~, Defendant

by ROBERT LEE PARKER

Plaintiff

Witness my hand this 23rd. day of April 1956

Alice J. Duck
ALICE J. DUCK

Clerk

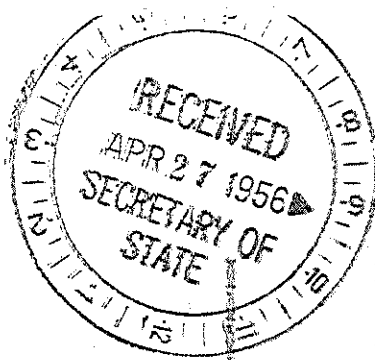
ROBERT LEE PARKER

PLAINTIFF

VS

THOMAS WEEKS AND ERNEST P.
WEEKS

DEFENDANTS



IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. 2908

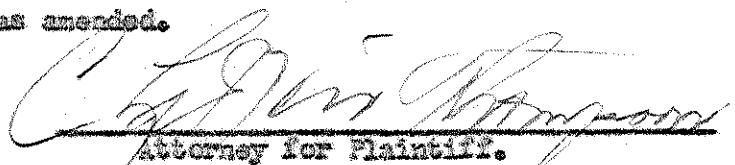
1.

Plaintiff claims of the Defendants the sum of Six Hundred (\$600.00) Dollars as damages, in this that heretofore on to-wit; 24th day of April, 1955 the Defendants while engaged in a joint venture, and that Ernest P. Weeks while so engaged, so negligently operated a motor vehicle southwardly on Moran Street, near its intersection with Saw Mill Road, both of which are public streets in Bay Minette, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was being driven in a southerly direction on said Moran Street, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, all to the injury of the Plaintiff, hence this suit.

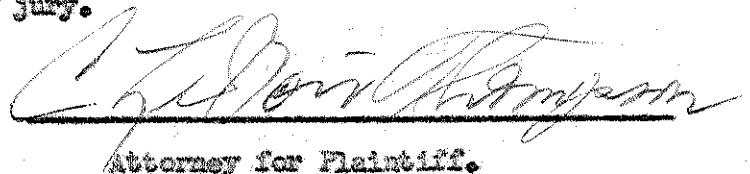
AND Plaintiff further avers that the Defendants, Thomas Weeks is in Springfield, Massachusetts, his address being 775 Union Street, Springfield, Massachusetts; and that the defendant Ernest P. Weeks resides in Springfield, Massachusetts; his address being 775 Union Street, Springfield, Massachusetts; and that the said Defendants are and were on the date of said collision, to-wit: 24th day of April, 1955 residing as stated and that the said Thomas Weeks and Ernest P. Weeks were non-residents of the State of Alabama on said date and that the present post office address of said non-resident defendants are as follows:

Thomas Weeks, 775 Union Street, Springfield, Massachusetts,
Ernest P. Weeks, 775 Union Street, Springfield, Massachusetts.

AND Plaintiff prays that the service of process upon the non-resident defendants named herein may be had in accordance with the provisions of the 1940 Code of Alabama, Title 7, Section 199, as amended.


Attorney for Plaintiff.

Plaintiff demands a trial by jury.


Attorney for Plaintiff.

ROBERT LEE PARKER,
Plaintiff,
VS.

THOMAS MEEKS AND ERNEST P. MEEKS,
Defendants,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA

CASE NO. 2908

MOTION TO QUASH SERVICE

Comes now the defendant, Ernest P. Meeks, and appearing specially and only for the purpose of making this motion and no other, and without waiving proper service, moves the court to quash and vacate the service in the above entitled cause made by the Sheriff of Montgomery County, Alabama upon the Secretary of State, State of Alabama, on, to-wit, April 27, 1956 as agent of said defendant as a non-resident of the State of Alabama under Title 7 Section 199 Code of Alabama (1940) and for grounds of said motion, this defendant says, that at the time the alleged cause of action sued on arose, to-wit, the 24th day of April, 1955, he was not a non-resident of the State of Alabama but was a resident of Baldwin County, Alabama.

THOMAS F. PARKER

By: J. T. Salmon
Attorney for Ernest P. Meeks

I hereby certify that I have this 20 day of June, 1956 mailed a copy of the foregoing motion to quash service, postage prepaid, to C. Le Noir Thompson, Bay Minette, Alabama, Attorney of Record for Plaintiff.

THOMAS F. PARKER

J. T. Salmon
Attorney for Ernest P. Meeks

J. THADDEUS SALMON
ASSOCIATE

PHONES:
OFFICE 4-0286
HOME 3-4615

THOMAS F. PARKER
ATTORNEY AT LAW
201 CLAYTON STREET
MONTGOMERY, ALABAMA

June 20, 1956

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

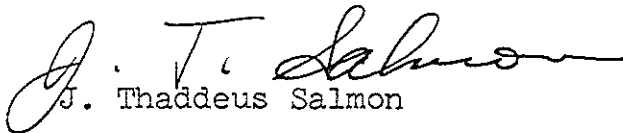
Re: Parker vs. Meeks and Meeks
My File: I-3661

Dear Mrs. Duck:

Please file the enclosed motions to quash service
in the above styled case and return a copy to me reflecting
that the same have been filed.

Thank you very much.

Yours very truly,


J. Thaddeus Salmon

JTS:kc

Enclosures

ROBERT LEE PARKER
PLAINTIFF

VS

THOMAS WEEKS AND ERNEST P.
WEEKS

DEFENDANTS

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

CASE NO. 2908

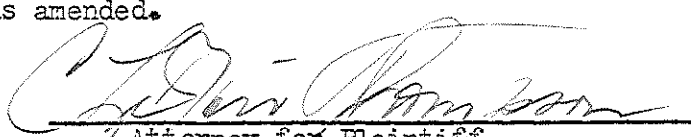
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AND Plaintiff further avers that the Defendants, Thomas Weeks is in Springfield, Massachusetts, his address being 775 Union Street, Springfield, Massachusetts; and that the defendant Ernest P. Weeks resides in Springfield, Massachusetts; his address being 775 Union Street, Springfield, Massachusetts; and that the said Defendants are and were on the date of said collision, to-wit: 24th day of April, 1955 residing as stated and that the said Thomas Weeks and Ernest P. Weeks were non-residents of the State of Alabama on said date and that the present post office address of said non-resident defendants are as follows:

~~Thomas Weeks, 775 Union Street, Springfield, Massachusetts,~~
~~Ernest P. Weeks, 775 Union Street, Springfield, Massachusetts.~~

AND Plaintiff prays that the service of process upon the non-resident defendants named herein may be had in accordance with the provisions of the 1940 Code of Alabama, Title 7, Section 199, as amended.


Attorney for Plaintiff.

Plaintiff demands a trial by jury.


Attorney for Plaintiff.

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2908

April TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

THOMAS MEEKS AND ERNEST P. MEEKS, 775 Union Street, Springfield,

Massachusetts;

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 THOMAS MEEKS AND
ERNEST P. MEEKS, 775 Union Street, Springfield, Mass., Defendant.

by ROBERT LEE PARKER

, Plaintiff.

Witness my hand this 23rd. day of April 1956

Alice J. Duck
ALICE J. DUCK

, Clerk

No. 2-908

Page _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Robert Lee Parker

Plaintiffs

vs.

Thomas Mucke & Ernest

P. Mucke

Defendants

SUMMONS and COMPLAINT

Filed FILED, 19

APR 25 1956

Clerk

ALICE J. WICK, CLERK

Plaintiff's Attorney

Defendant's Attorney

519
Defendant lives at

RECEIVED IN OFFICE

RECEIVED IN OFFICE
APR 26 1956

M. S. BUTLER, Sheriff

, 19

Sheriff

I have executed this summons

this 4-27-, 1956
by leaving 3 copy with

EXECUTED BY SERVING 6
COPIES OF THE WITHIN

M. S. Butler

Sec. of State of
State of Ala.

4-27-56

M. S. Butler
Sheriff Montgomery County

By Mathis
Deputy Sheriff

Sheriff

Deputy Sheriff

ROBERT LEE PARKER

PLAINTIFF

VS

THOMAS MEEKS and ERNEST P.
MEEKS

DEFENDANTS

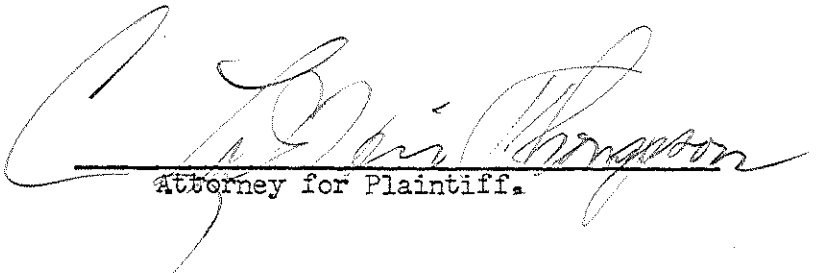
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. ~~2552~~ 2908

Plaintiff claims of the Defendants the sum of Six Hundred (\$600.00) Dollars as damages, in this that heretofore on to-wit; 24th day of April, 1955 the Defendants while engaged in a joint venture, and that Ernest P. Meeks while so engaged, so negligently operated a motor vehicle southwardly on Moran Street, near its intersection with Saw Mill Road, both of which are public streets in Bay Minette, Baldwin County, Alabama, as to cause or allow said motor vehicle to collide with or run against the automobile of the Plaintiff which was being driven in a southerly direction on said Moran Street, and as a proximate consequence thereof, Plaintiff's automobile was badly bent, broken and damaged, all to the injury of the Plaintiff, hence this suit.


Attorney for Plaintiff.