

STATE OF ALABAMA  
BALDWIN COUNTY

2952  
IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Samuel J. Welch 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 Connie Daniel.

Witness my hand this 19 day of June, 1956.

W. J. Welch  
Clerk.

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COMPLAINT

CONNIE DANIEL,

Plaintiff,

vs.

SAMUEL J. WELCH,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

COUNT ONE:

The Plaintiff claims of the Defendant Three Thousand Dollars (\$3,000.00) as damages for that on, heretofore, to-wit: June 4, 1956 at about 8:00 P. M., at the intersection of the Old Daphne Road with U. S. Highway No. 31, both public roads in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into and collide with a motor vehicle then and there being operated by the Plaintiff and as a proximate consequence and result of the negligence of the Defendant, aforesaid, the Plaintiff was severely injured and damaged in this: she was knocked unconscious and suffered a brain concussion, both of her knees were lacerated, her upper lip was cut and bruised, her right cheek was cut and bruised, she was hospitalized and cause to incur medical expenses for the treatment of her injuries, she was caused to lose time from her employment, her dentures were broken

and destroyed and she suffered great physical pain and mental ang-  
uish and continues to suffer such pain and anguish; all to her  
damages aforesaid, wherefore she brings this suit and asks judgment  
in the above amount.

CHASON & STONE

By: Malcolm C. Stone  
Attorneys for Plaintiff

Defendant resides in Mobile, Alabama.

RECEIVED  
JUN 10 1920  
FILED

SUMMONS AND COMPLAINT

IVAN RIDE

RECEIVED  
COMMITTEE VIVIAN

IN THE CIRCUIT COURT OF

Defendant

SAMUEL L. MURPHY

AR.

PLAINTIFF

COMMITTEE DUNN

RECEIVED  
JUN 10 1920  
FILED

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CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

JOHN CHASON  
NORBORNE C. STONE, JR.

PHONE 3641

November 21, 1956

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

Dear Mrs. Duck:

Re: Daniel vs. Welch  
Case #2952

We would appreciate it if you would return the Summons and Complaint in the above case to the Sheriff with a notation that we have found a new address for the Defendant in Mobile County. The last known address that we have is 851 Dauphin Street in Mobile and we would like for this complaint to be again forwarded to the Sheriff of Mobile County and an attempt made to locate the Defendant at the noted address.

Thank you for your prompt attention to this matter.

Yours very truly,

CHASON & STONE

By: 

NCS:bw

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - LAW SIDE.

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You are hereby commanded to summon Samuel J. Welch 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 Connie Daniel.

Witness my hand this 19 day of June, 1956.

Reice J. Duck  
Clerk.

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COMPLAINT

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and destroyed and she suffered great physical pain and mental anguish and continues to suffer such pain and anguish; all to her damage aforesaid, wherefore she brings this suit and asks judgment in the above amount.

CHASON & STONE

By: Marion C. Stone  
Attorneys for Plaintiff

Defendant resides in Mobile, Alabama.

Received 19 day of June 1956  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
I served a copy of the within see  
on \_\_\_\_\_  
By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
By \_\_\_\_\_ D. S.

RETURNED 6-26-56  
Not found in my County after dili-  
gent search and inquiry.  
RAY D. BRIDGES, Sheriff  
By S. Bridges D. S.

06/21/56 Bay Minette Md. 2952 198 438  
CONNIE DANIEL, **RECORDED**  
Plaintiff,  
vs.  
SAMUEL J. WELCH,  
Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE  
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SUMMONS and COMPLAINT

\*\*\*\*\*  
**FILED**  
JUN 19 1956  
ALICE L. DUCK, Clerk

LAW OFFICES  
**CHASON & STONE**  
BAY MINETTE, ALABAMA