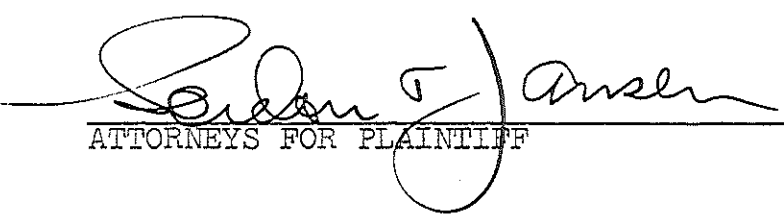


JOHN YANCEY,
Plaintiff,
vs.
NORMAN CLAYTON MARTIN,
Defendant.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY,
ALABAMA.
AT LAW
CASE NO. 3839

COUNT ONE

Plaintiff claims of the Defendant the sum of Two Thousand Five Hundred and No/100 (\$2,500.00) Dollars as damages in this that heretofore on to-wit the 18th day of May, 1958, the Defendant so negligently operated a motor vehicle westwardly on U. S. Highway 31 at or near its intersection with Baldwin County Highway No. 27, both of which are public highways in Baldwin County, Alabama, as to collide with or run against the automobile of the Plaintiff which was then being driven in a westwardly direction on said U. S. Highway 31 and as a proximate consequence thereof Plaintiff's automobile was badly bent, broken and damaged and Plaintiff was painfully and seriously injured about the knees, face and nose and he suffered great physical pain and mental anguish and he was compelled to incur great expense, hence this suit.


ATTORNEYS FOR PLAINTIFF

Plaintiff respectively demands that this case be
tried by a jury.


ATTORNEYS FOR PLAINTIFF

Defendant's address:

882 Roynoier Street
Biloxi, Mississippi

3839

809

RECEIVED IN OFFICE

MAY 18 1959

M. S. BUTLER, Sheriff

John Yancy

vs

Norman Clayton Martin

3

Executed by serving 3 copies of
 the within on Betty Frink
 Secretary of State of The State of
 Alabama.

(This the 18 day of May 1959)

Sheriff of Montgomery County

M. S. Butler,

By James D. S.

The Sheriff claims 2
 miles at 10c per mile for a total
 of \$ 20
 M. S. Butler, Sheriff
 Montgomery County, Ala.

FILED

MAY 18 1959

ALICE J. DUCK, CLERK
REGISTER

GORDON & JANSEN

ATTORNEYS AT LAW

1607-1610 MERCHANTS NATIONAL BANK BUILDING

A. FLETCHER GORDON
VERNOL R. JANSEN, JR.

MOBILE 11, ALABAMA

May 15, 1959

Mrs. Alice Duck, Clerk
Circuit Court
County Court House
Bay Minette, Alabama

Dear Mrs. Duck:

We enclose herewith original and three copies of Complaint to be docketed in your court. We are also enclosing our firm check in the sum of \$3.00, the statutory fee required when service is to be acquired under Use of Highways statute. Please serve the Secretary of State with instructions that the defendant, Norman Clayton Martin, may be served at 882 Roynoier Street, Biloxi, Mississippi. Please acknowledge receipt of this complaint and keep us informed of information reported to you regarding service of process.

Very truly yours,

GORDON & JANSEN

Vernol R. Jansen, Jr.

BY: *ir*

VRJjr/ir
Enclosures 5



STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY 4, ALABAMA

BETTYE FRINK
SECRETARY OF STATE

May 28, 1959

Honorable A. Fletcher Gordon
Gordon & Jansen
Attorneys at Law
Merchants National Bank Building
Mobile, Alabama

Re: John Yancey VS Norman Clayton Martin

Dear Mr. Gordon:

Please refer to your file in the above-styled cause and be advised that on May 18, 1959, I sent by registered mail, return receipt requested, deliver to addressee only, my notice, with copy of Summons and Complaint attached, to:

Norman Clayton Martin
882 Roynoler Street
Biloxi, Mississippi

On May 26, 1959, this letter (Registered No. 50609) was returned to me with reason for non-delivery given as "Moved, Left No Address."

Will you please advise me as to any further efforts you wish me to make in perfecting this service.

Sincerely yours,

B. F.

Bettye Frink
Secretary of State

N. H. T.

By: (Mrs.) Nancy H. Turner
Administrative Assistant

cc: Honorable Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Norman Clayton Martin

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-----

Norman Clayton Martin-----, Defendant--

by John Yancy-----

-----, Plaintiff--

Witness my hand this 16th day of May 1959

Wing J. Rusk, Clerk

No. _____ Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19__

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19__

_____, Sheriff

I have executed this summons

this _____ 19__

by leaving a copy with

Sheriff

Deputy Sheriff