

GEORGE W. MCKINLEY
PLAINTIFF

VS

CHARLES HUDSON RAINES, GOFF
JERKINS, CLARENCE MILLER AND
MILLER & JERKINS, INC., a
corporation,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

3894

Come the defendants in the above style cause and demurring
to plaintiff's complaint say:

1. The matters therein alleged do not state a cause
of action against these defendants.

Beebe & Swearingen

By

W. C. Beebe
Attorneys for defendants

Filed
7-27-59

3894 June

George W. McKinley

Plaintiff

vs

Charles Hudson Raines, et al.

Defendants

Demurrer

FILED

JUL 27 1900

ALICE J. DUCK, CLERK
DEPT. OF JUSTICE

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Charles HUDSON RAINES, GOFF JERKINS, CLARENCE MILLER AND MILLER & JERKINS, INC., a corporation, 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 GEORGE W. MCKINLEY.

WITNESS My hand this 7 day of July, 1959.

Reese J. Ruck
Clerk

GEORGE W. MCKINLEY

PLAINTIFF

VS

CHARLES HUDSON RAINES, GOFF
JERKINS, CLARENCE MILLER AND
MILLER & JERKINS, INC., A
CORPORATION,

DEFENDANTS

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

1.

The Plaintiff claims of the Defendants SEVENTY FIVE HUNDRED (\$7500.00) DOLLARS as damages for that heretofore on to-wit, the 5th day of December, 1958, the Defendants, Goff Jerkins, Clarence Miller and Miller & Jerkins, Inc., a corporation, acting by and through their agent, servant or employee, Charles Hudson Raines, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck on or along U. S. Highway No. 90, a public highway, at or near the east end of Blakely Bridge and approximately 6.2 miles east of the City of Mobile and in Baldwin County, Alabama; that said automobile truck was negligently driven into or against the automobile of the Plaintiff at said time and place, and as a direct and proximate consequence and result of said negligence the Plaintiff was injured as follows: he received whip-lash injuries to his neck; his shoulder joints were bruised and injured; he was caused to suffer much anguish and pain and spend great sums of money in the treatment of his injuries; he has suffered temporary and permanent damages, all to the loss of the Plaintiff in the aforesaid amount.

The Plaintiff avers that the Defendant, Charles Hudson Raines, is and was on the date of said collision a non-resident of the State of Alabama; that the present post office address of this said Defendant is Route 3, Bonifay, Florida; that the Defendants, Goff Jerkins, and Clarence Miller and Miller & Jerkins, Inc., a corporation, are and were on the date of said collision non-residents of the State of Alabama, and that their present post office addresses are Bonifay, Florida; and the Plaintiff prays that service of process upon the Defendants, Charles Hudson Raines, Goff Jerkins, Clarence Miller and Miller & Jerkins, Inc., a corporation, be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

HORNE, WEBB & TUCKER

BY:

John M Brantley
Attorneys for the Plaintiff

WILTERS & BRANTLEY

BY:

John M Brantley
Attorneys for the Plaintiff

The Plaintiff demands a trial by jury.

Wilters & Brantley

BY:

John M Brantley
Attorneys for the Plaintiff

1103

RECEIVED IN OFFICE
JUL 14 1959
M. S. BUTLER, Sheriff

The Clerk claims
miles at \$0.06 per
of \$.20
M. S. Butler, Sheriff
Montgomery County
TAYLOR WILKINS, Sheriff
D. S.
Received
and on
served on
day of
1959

Executed by serving 12 copies of
the within on Betty Trump
Secretary of State of The State of
Alabama.

This the 14 day of July 1959

Sheriff of Montgomery County
M. S. Butler,

By *Ramona D. S.*

3894 ✓

GEORGE W. McKINLEY

PLAINTIFF

VS.

CHARLES HUDSON RAINES, ET AL,

DEFENDANTS

BILL OF COMPLAINT

FILED
JUL 7 1959
ALICE J. DUCK, CLERK
REGISTER

July 21, 1959

GEORGE W. McKINLEY, Plaintiff
VS
CLARENCE MILLER, et al, Defendants

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

CASE NO. 3894

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

I, Bettye Frink, Secretary of State, hereby certify that on July 14, 1959
I sent by registered mail in an envelope addressed as follows:

" Clarence Miller
Bonifay, Florida"

"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:

" Clarence Miller
Bonifay, Florida"

You will take notice that on July 14, 1959 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: GEORGE W. McKINLEY, Plaintiff VS CLARENCE MILLER, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 3894 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 14
day of July 1959

Enclosure (1)

(Signed) Bettye Frink
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 July 17, 1959 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Bonifay, Fla.
on 7-16-59

WITNESS MY HAND and the Great Seal of the State of Alabama this the 21 day
of July 1959

Bettye Frink
Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable Tolbert Brantley
Wilters & Brantley
Attorneys at Law
Courthouse Square
Bay Minette, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CHARLES HUDSON RAINES, GOFF JERKINS, CLARENCE MILLER AND MILLER & JERKINS, INC., a corporation, 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 GEORGE W. MCKINLEY.

WITNESS my hand this 7 day of July, 1959.

Reid J. Clark

JACK

GEORGE W. MCKINLEY

PLAINTIFF

VS

CHARLES HUDSON RAINES, GOFF
JERKINS, CLARENCE MILLER AND
MILLER & JERKINS, INC., A
CORPORATION,

DEFENDANTS

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1.

IN JUDICIAL COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

The Plaintiff claims of the Defendants SEVENTY FIVE HUNDRED (\$7500.00) DOLLARS as damages for that heretofore on to-wit, the 5th day of December, 1958, the Defendants, Goff Jenkins, Clarence Miller and Miller & Jenkins, Inc., a corporation, acting by and through their agent, servant or employee, Charles Hudson Raines, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck on or along U. S. Highway No. 90, a public highway, at or near the east end of Blakely Bridge and approximately 6.2 miles east of the City of Mobile and in Baldwin County, Alabama; that said automobile truck was negligently driven into or against the automobile of the Plaintiff at said time and place, and as a direct and proximate consequence and result of said negligence the Plaintiff was injured as follows: he received whip-lash injuries to his neck; his shoulder joints were bruised and injured; he was caused to suffer much anguish and pain and spend great sums of money in the treatment of his injuries; he has suffered temporary and permanent damages, all to the loss of the Plaintiff in the aforesaid amount.

The Plaintiff avers that the Defendant, Charles Hudson Raines, is and was on the date of said collision a non-resident of the State of Alabama; that the present post office address of this said Defendant is Route 1, Bonifay, Florida; that the Defendants, Goff Jenkins and Clarence Miller and Miller and Jenkins, Inc., a corporation, are and were on the date of said collision non-residents of the State of Alabama, and that their present post office addresses are Bonifay Florida, and the Plaintiff prays that service of process upon the Defendants, Charles Hudson Raines, Goff Jenkins, Clarence Miller and Miller & Jenkins, Inc., a corporation, be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 192.

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NOV 11 1932

BY: [Signature]

CHARLES HUDSON RAINES, ET AL.

DEFENDANTS

FILED IN COMPLAINT

WILSON & BRANTLEY

BY: [Signature] Attorneys for the Defendant

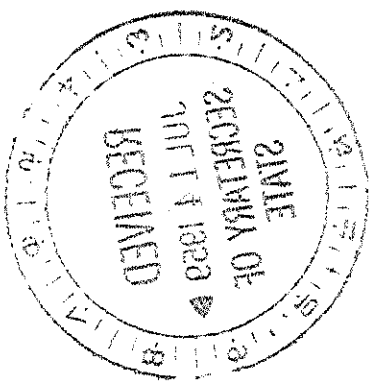
WILSON & BRANTLEY

BY: [Signature] Attorneys for the Plaintiff

The Plaintiff demands a trial by jury.

WILSON & BRANTLEY

BY: [Signature] Attorneys for the Plaintiff



July 21, 1959

GEORGE McKINLEY, Plaintiff
VS
GOFF JERKINS, et al, Defendants

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

CASE NO. 3894

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

I, Bettye Frink, Secretary of State, hereby certify that on July 14, 1959
I sent by registered mail in an envelope addressed as follows:

"Goff Jerkins
Bonifay, Florida"

"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:

"Goff Jerkins
Bonifay, Florida"

You will take notice that on July 14, 1959 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: GEORGE W. McKINLEY, Plaintiff VS GOFF JERKINS, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 3894 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 14
day of July 1959

Enclosure (1)

(Signed) Bettye Frink
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 July 17, 1959 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Bonifay, Fla.
on 7-16-59

WITNESS MY HAND and the Great Seal of the State of Alabama this the 21 day
of July 1959

Bettye Frink
Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable Tolbert Brantley
Wilters & Brantley
Attorneys at Law
Courthouse Square
Bay Minette, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CHARLES HUDSON RAINES, GOFF JERKINS, CLARENCE MILLER AND MILLER & JERKINS, INC., a corporation, 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 GEORGE W. MCKINLEY.

WITNESS my hand this 2 day of July, 1959.

Reice L. Duck
Clerk

GEORGE W. MCKINLEY

PLAINTIFF

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

CHARLES HUDSON RAINES, GOFF
JERKINS, CLARENCE MILLER AND
MILLER & JERKINS, INC., A
CORPORATION,

AT LAW

DEFENDANTS

1.

The Plaintiff claims of the Defendants SEVENTY FIVE HUNDRED (\$7500.00) DOLLARS as damages for that heretofore on to-wit, the 5th day of December, 1958, the Defendants, Goff Jenkins, Clarence Miller and Miller & Jenkins, Inc., a corporation, acting by and through their agent, servant or employee, Charles Hudson Raines, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck on or along U. S. Highway No. 90, a public highway, at or near the east end of Blakely Bridge and approximately 6.2 miles east of the City of Mobile and in Baldwin County, Alabama; that said automobile truck was negligently driven into or against the automobile of the Plaintiff at said time and place, and as a direct and proximate consequence and result of said negligence the Plaintiff was injured as follows: he received whip-lash injuries to his neck; his shoulder joints were bruised and injured; he was caused to suffer much anguish and pain and spend great sums of money in the treatment of his injuries; he has suffered temporary and permanent damages, all to the loss of the Plaintiff in the aforesaid amount.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CHARLES HUDSON RAINES, GOFF JERKINS, CLARENCE MILLER AND MILLER & JERKINS, INC., a corporation, 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 GEORGE W. MCKINLEY.

WITNESS my hand this 7 day of July, 1959.

Deicey L. Duck
Clerk

GEORGE W. MCKINLEY

PLAINTIFF

CHARLES HUDSON RAINES, GOFF
JERKINS, CLARENCE MILLER AND
MILLER & JERKINS, INC., A
CORPORATION,

DEFENDANTS

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

1.

The Plaintiff claims of the Defendants SEVENTY FIVE HUNDRED (\$7500.00) DOLLARS as damages for that heretofore on to-wit, the 5th day of December, 1958, the Defendants, Goff Jenkins, Clarence Miller and Miller & Jenkins, Inc., a corporation, acting by and through their agent, servant or employee, Charles Hudson Raines, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck on or along U. S. Highway No. 90, a public highway, at or near the east end of Flakely Bridge and approximately 6.2 miles east of the City of Mobile and in Baldwin County, Alabama; that said automobile truck was negligently driven into or against the automobile of the Plaintiff at said time and place, and as a direct and proximate consequence and result of said negligence the Plaintiff was injured as follows: he received whip-lash injuries to his neck; his shoulder joints were bruised and injured; he was caused to suffer much anguish and pain and spend great sums of money in the treatment of his injuries; he has suffered temporary and permanent damages, all to the loss of the Plaintiff in the aforesaid amount.

The Plaintiff avers that the Defendant, Charles Hudson Raines, is and was on the date of said collision a non-resident of the State of Alabama; that the present post office address of this said Defendant is Route 3, Bonifay, Florida; that the Defendants, Goff Jenkins and Clarence Miller and Miller and Jenkins, Inc., a corporation, are and were on the date of said collision non-residents of the State of Alabama, and that their present post office addresses are Bonifay Florida, and the Plaintiff prays that service of process upon the Defendants, Charles Hudson Raines, Goff Jenkins, Clarence Miller and Miller & Jenkins, Inc., a corporation, be had in accordance with the Provisions of the Code of Alabama of 1940, Title 7, Section 399.

3817

CHARLES H. RAINES, ET AL.

DEFENDANTS

GOFF JENKINS, CLARENCE MILLER, MILLER & JENKINS, INC.

DEFENDANTS

IN COMPLIANCE

WILKINS & BRANTLEY

BY: William M. Brantley
Attorneys for the Defendant

WILKINS & BRANTLEY

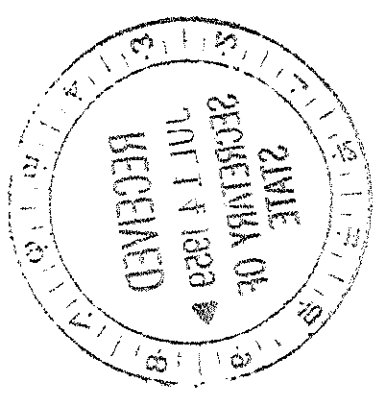
BY: William M. Brantley
Attorneys for the Plaintiff

RECEIVED
CLERK

The Plaintiff demands a trial by jury.

WILKINS & BRANTLEY

BY: William M. Brantley
Attorneys for the Plaintiff



3894

GEORGE W. MCKINLEY

PLAINTIFF

VS

CHARLES HUDSON RAINES, ET AL,

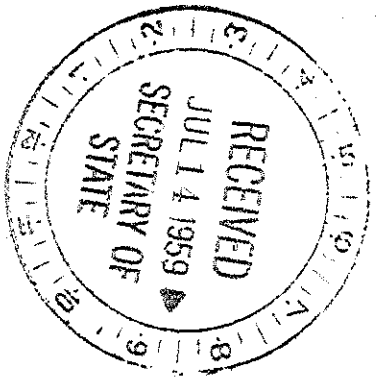
DEFENDANTS

BILL OF COMPLAINT

ALICE J. DICK, CLERK, REGISTER

JUL 14 1959

FILED



July 21, 1959

GEORGE W. McKINLEY, Plaintiff
VS
CHARLES HUDSON RAINES, et al, Defendants

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

CASE NO. 3894

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

I, Bettye Frink, Secretary of State, hereby certify that on July 14, 1959
I sent by registered mail in an envelope addressed as follows:

" Charles Hudson Raines
Route 3
Bonifay, Florida"

"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:

" Charles Hudson Raines
Route 3
Bonifay, Florida"

You will take notice that on July 14, 1959 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: GEORGE W. McKINLEY, Plaintiff VS CHARLES HUDSON RAINES,
et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 3894 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 14
day of July 1959

Enclosure (1)

(Signed) Bettye Frink
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 July 20, 1959 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Bonifay, Fla.
on 7/17/59

WITNESS MY HAND and the Great Seal of the State of Alabama this the 21 day
of July 1959

Bettye Frink
Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable Tolbert Brantley
Wilters & Brantley
Attorneys at Law
Courthouse Square
Bay Minette, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CHARLES HUDSON RAINES, GOFF JERKINS, CLARENCE MILLER AND MILLER & JERKINS, INC., a corporation, 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 GEORGE W. MCKINLEY.

WITNESS my hand this 7 day of July, 1959.

W. J. Jenkins
Clerk

GEORGE W. MCKINLEY

PLAINTIFF

VS

CHARLES HUDSON RAINES, GOFF
JERKINS, CLARENCE MILLER AND
MILLER & JERKINS, INC., A
CORPORATION,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

1.

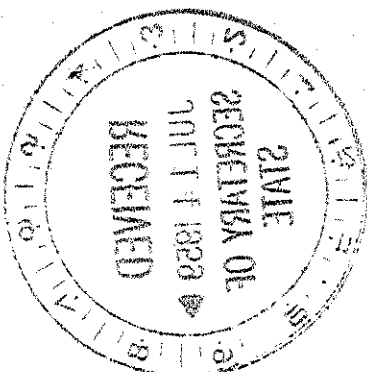
The Plaintiff claims of the Defendants SEVENTY FIVE HUNDRED (\$7500.00) DOLLARS as damages for that heretofore on to-wit, the 5th day of December, 1958, the Defendants, Goff Jenkins, Clarence Miller and Miller & Jenkins, Inc., a corporation, acting by and through their agent, servant or employee, Charles Hudson Raines, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck on or along U. S. Highway No. 90, a public highway, at or near the east end of Blakely Bridge and approximately 6.2 miles east of the City of Mobile and in Baldwin County, Alabama; that said automobile truck was negligently driven into or against the automobile of the Plaintiff at said time and place, and as a direct and proximate consequence and result of said negligence the Plaintiff was injured as follows: he received whip-lash injuries to his neck; his shoulder joints were bruised and injured; he was caused to suffer much anguish and pain and spend great sums of money in the treatment of his injuries; he has suffered temporary and permanent damages, all to the loss of the Plaintiff in the aforesaid amount.

BY: J. Albert M. Brantley
Attorneys for the Plaintiff

BY: James M. Brandy
Attorneys for the Plaintiff

Wilgore & Brantley

BY: Allen M Brantley
Attorneys for the Plaintiff



3894

GEORGE W. MCKINLEY

PLAINTIFF

VS

CHARLES HUDSON RAINES, ET AL,

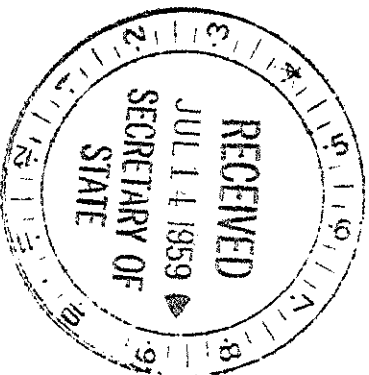
DEFENDANTS

BILL OF COMPLAINT

FILED

JUL 7 1959

ALICE J. DICK, CLERK, REGISTER



July 21, 1959

GEORGE W. MCKINLEY, Plaintiff
VS

MILLER & JERKINS, INC., A CORPORATION, et al, Defendants

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

CASE NO. 3894

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

I, Bettye Frink, Secretary of State, hereby certify that on July 14, 1959
I sent by registered mail in an envelope addressed as follows:"Miller & Jerkins, Inc.
Bonifay, Florida""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:"Miller & Jerkins, Inc.
Bonifay, Florida"You will take notice that on July 14, 1959 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: GEORGE W. MCKINLEY, Plaintiff VS MILLER & JERKINS, INC.,
A CORPORATION, et al, Defendantsin the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AT LAW
Case No. 3894 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 14
day of July 1959

Enclosure (1)

(Signed) Bettye Frink
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 July 17, 1959 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Bonifay, Fla.
on 7-16-59WITNESS MY HAND and the Great Seal of the State of Alabama this the 21 day
of July 1959*Bettye Frink*Bettye Frink
Secretary of StateEnclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable Tolbert Brantley
Wilters & Brantley
Attorneys at Law
Courthouse Square
Bay Minette, Alabama

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WITNESS Myhand this 7 day of July, 1959.

CLERK

24

The Plaintiff claims of the Defendants SEVENTY FIVE HUNDRED (\$7500.00) DOLLARS as damages for that heretofore on to-wit, the 5thday of December, 1958, the Defendants, Goff Jenkins, Clarence Miller and Miller &Jenkins, Inc., a corporation, acting by and through their agent, servant or employee, Charles Hudson Raines, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck on or along U. S. Highway No. 90, a public highway, at or near the east end of Blakely Bridge and approximately 6.2 miles east of the City of Mobile and in BaldwinCounty,Alabama;that said automobile truck was negligently driven into or against the automobile of the Plaintiff at said time and place, and as a direct and proximate consequence and result of said negligence the Plaintiff wasinjured as follows: he received whip-lash injuries to his neck; his shoulder joints were bruised and injured;he was caused to suffer much anguish and pain and spend great sums of money in the treatment of his injuries; he has suffered temporary and permanent damages, all to the loss of the Plaintiff in the aforesaid amount.

3822
The Plaintiff avers that the Defendant, Charles Hudson Raines, is and was on the date of said collision a non-resident of the State of Alabama; that the present post office address of this said Defendant is Route 3, Bonifay, Florida; that the Defendants, Goff Jerkins, and Clarence Miller and Miller & Jerkins, Inc., a corporation, are and were on the date of said collision non-residents of the State of Alabama, and that their present post office addresses are Bonifay, Florida; and the Plaintiff prays that service of process upon the Defendants, Charles Hudson Raines, Goff Jerkins, Clarence Miller and Miller & Jerkins, Inc., a corporation, be had in accordance with the provisions of the Code of Alabama of 1940, Title 7, Section 199.

HORNE, WEBB & TUCKER

BY: Robert M. Brantley

Attorneys for the Plaintiff

WILTERS & BRANTLEY

BY: Robert M. Brantley

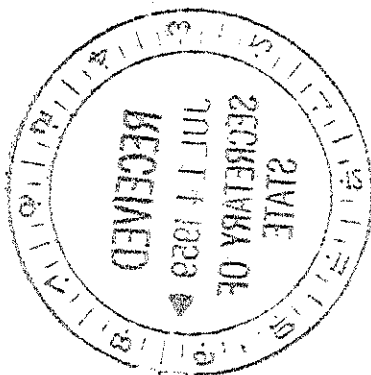
Attorneys for the Plaintiff

The Plaintiff demands a trial by jury.

Wilters & Brantley

BY: Robert M. Brantley

Attorneys for the Plaintiff



3894

GEOFFREY W. MCKINLEY
PLAINTIFF

VS

CHARLES HUDSON RAINES, ET AL,
DEFENDANTS

BILL OF COMPLAINT

The Plaintiff avers that the Defendant, Charles Hudson Raines, is and was on the date of said collision a non-resident of the State of Alabama; that the present post office address of this said Defendant is Route 3, Bonifay, Florida; that the Defendants, Earl Lewis, and Clarence Miller and Miller & Lewis, Inc., a corporation, are and were on the date of said collision non-residents of the State of Alabama, and that their present post office addresses are Bonifay, Florida; and the Plaintiff prays that service of process upon the Defendants, Charles Hudson Raines, Earl Lewis, Clarence Miller and Miller & Lewis, Inc., a corporation, be had in accordance with the provisions of the Code of Alabama of 1901, Title 7, Section 196.

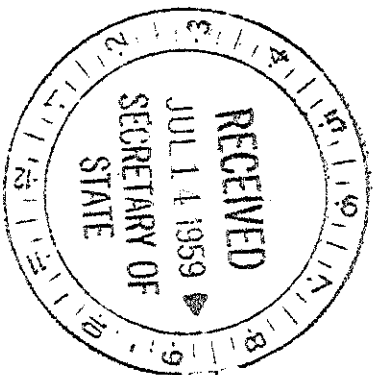
FILED

JUL 2 1959

ALICE J. DICK, CLERK, REGISTER

WITNESSES & SHERIFF

WITNESSES & SHERIFF



GEORGE W. MCKINLEY VS GOFF JERKINS, et al,

1-INSTRUCTIONS TO DELIVERING EMPLOYEE

☒ Deliver ONLY to addressee

☐ Show address where delivered

3894

Additional charges required for these services

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

W. G. Jenkins

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED

7-16-59

ADDRESS WHERE DELIVERED (only if requested in item #1)

255-(6-71548-1) GPO

POD Form 3831
1958

INSTRUCTIONS: Fill in items by
plate #4 on address label when applicable.
Return ends and attach to back of article.
on front of article. Return Registered

REGISTERED NO. 50223
CERTIFIED NO.
INSURED NO.

NAME OF SENDER
SECRETARY OF STATE
MONTGOMERY, ALABAMA

CITY, ZONE AND STATE

DELIVERING OFFICE

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JUL 16
14 - PM

RECEIVED
SECRETARY OF STATE
MONTGOMERY, ALABAMA

655-16-71540-4

GEORGE W. MCKINLEY VS CHARLES HUDSON RAINES, et al

#1- INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Deliver ONLY to addressee ☐ Show address where delivered ☐ Show address where delivered ☐ Show address where delivered

Additional charges required for these services 389A

RETURN RECEIPT

Received the numbered article described on other side

SIGNATURE OR NAME OF ADDRESSEE (must be written, initialed or stamped)

Charles Hudson Raines

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED ADDRESS WHERE DELIVERED (only if requested, check #1)

7/17/59

GEORGE W. MCKINNEY VS CLARENCE MILLER, et al

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE

Deliver ONLY to addressee ☐ **Show address where delivered** ☒ **389/4**

(Additional charges required for these services)

RETURN RECEIPT

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SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

Clarence M. Kelly

100-71464-1000

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED:	ADDRESS WHERE DELIVERED only if requested in Item # 1)
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65-91-1

POST OFFICE DEPARTMENT
ORIGINAL BUSINESS

FINALLY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE, \$3.00

POSTMARK OF
DELIVERING OFFICE

RECEIVED
JUL 17 1959
SECRETARY OF
STATE

INSTRUCTIONS: Return to
State, if enclosed and marked
"Return to State" or "Return to
Post Office" and attach to full
return of original return, return
to Post Office.

REGISTERED NO.
502225
CERTIFIED NO.
INSURED NO.

NAME OF SENDER
STATE
SECRETARY OF STATE
MONTGOMERY, ALABAMA

CITY, ZONE AND STATE

POST FORM 3811
035-16-11542-4