

July 17, 1959

CLEDIS PETERSON, Plaintiff
VS
ALBERT O. MORGAN, Defendant

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

CASE NO. 3901

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:

"Albert O. Morgan
Route 1
McDavid, 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:

" Albert O. Morgan
Route 1
McDavid, 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: CLEDIS PETERSON, Plaintiff VS ALBERT O. MORGAN, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 3901 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 16, 1959 I received the return card, showing receipt by the designated addressee of the aforementioned matter at McDavid, Fla.
on 7/15/59

WITNESS MY HAND and the Great Seal of the State of Alabama this the 17 day
of July 1959

Bettye Frink

Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable John Chason
Chason & Stone
Attorneys at Law
Arcade Building
Bay Minette, Alabama

IN THE CIRCUIT COURT - AT LAW

You are hereby commanded to summon Albert O. Morgan 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 Cledis Peterson.

George J. Smith
Clerk

AT LAW

Chas. S. Stone
Attorney for Plaintiff

Thomas Stone
Attorney for Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Blanche White, a Notary Public, in and for said County in said State, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is John Chason; that he is one of the attorneys of record for the Plaintiff in the above styled cause; that the Defendant is a non-resident of the State of Alabama and according to the report of the highway patrolman who investigated said case, his postoffice address is Route 1, McDavid, Florida. That it is necessary that service be had on such Defendant in accordance with Title 7, Section 199 of the 1940 Code of Alabama, as amended.

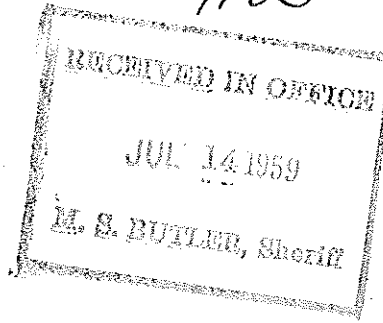
John Chason

Sworn to and subscribed before me
on this the 13th day of July, 1959.

Blanche White
Notary Public, Baldwin County, Alabama

Ex July 14, 1959
Sec. of State.

1105



No. 3906

CLEDIS PETERSON,
Plaintiff,
vs.
ALBERT O. MORGAN,
Defendant.

Executed by serving 3 copies of
the within on Betty Trink
Secretary of State of The State of
Alabama.
This the 14 day of July, 1959
Sheriff of Montgomery County,
M. S. Butler,
By Reemo D. S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

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

FILED
JUL 13 1959
ALICE J. DUCK, CLERK
REGISTER

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Albert O. Morgan 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 Cledis Peterson.

Witness my hand this 13 day of July, 1959.

Reese J. Luck
Clerk

CLEDIS PETERSON,

Plaintiff,

vs.

ALBERT O. MORGAN,

Defendant.

I

I

I

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Five Thousand Dollars (\$5,000.00) as damages for that, on heretofore, to-wit: January 26, 1959, at a point about one mile Northeast of Robertsedale, in Baldwin County, Alabama, on U. S. Highway 90, the Defendant negligently drove a truck into, upon or against a 1956 Mack tractor which was being driven along said highway at said time and place and which was owned by the Plaintiff, and as a proximate result of the negligence of such Defendant the Plaintiff's vehicle was damaged in this: Its cab was completely demolished, its hood, fenders and radiator was smashed, its frame was bent and it was almost completely demolished, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

Shanna Stone
Attorney for Plaintiff

Plaintiff demands a trial
of this cause by jury.

Shanna Stone
Attorney for Plaintiff

STATE OF ALABAMA

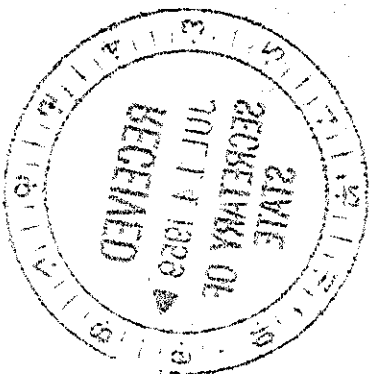
BALDWIN COUNTY

Before me, Blanche White, a Notary Public, in and for said County in said State, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is John Chason; that he is one of the attorneys of record for the Plaintiff in the above styled cause; that the Defendant is a non-resident of the State of Alabama and according to the report of the highway patrolman who investigated said case, his postoffice address is Route 1, McDavid, Florida. That it is necessary that service be had on such Defendant in accordance with Title 7, Section 199 of the 1940 Code of Alabama, as amended.

Sworn to and subscribed before me
on this the 13th day of July, 1959.

Blanche White
Notary Public, Baldwin County, Alabama



STATE OF ALABAMA

BALDWIN COUNTY

Before me, Blanche White, a Notary

Public, in and for said County in said State, personally appeared

John Cannon, who is known to me and who, after being by me

sworn and legally sworn, did depose and say under oath as follows:

That his name is John Cannon; that he is one of the at-

torneys of record for the Plaintiff in the above styled cause; that

the Defendant is a non-resident of the State of Alabama and

ask to the report of the highway patrolman who investigated

case, his postoffice address is Route 1, McDevitt, Florida.

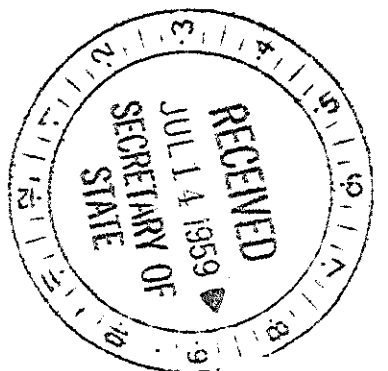
is necessary that service be had on such Defendant in accordance

with Title 7, Section 133 of the 1901 Code of Alabama, as amended.

Sworn to and subscribed before me

on this the 14th day of July, 1959.

Blanche White
Notary Public, Baldwin County, Alabama



ALICE L. DUCK, CLERK
REGISTER

JUL 13 1959

FILED

No. 2921

CLEDIS PETERSON VS ALBERT O. MORGAN

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Deliver ONLY to addressee

☐ Show address where delivered

3901

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

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

A O Morgan

SIGNATURE OF ADDRESSEE'S AGENT IF ANY

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED

7/18/59

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

POST OFFICE DEPARTMENT OFFICIAL BUSINESS		MAIL TO PRIVATE USE TO AVOID PENALTY \$300	
RECEIVED JUL 16 1969 U.S. AIR MAIL		POSTMASTER'S OFFICE DELIVERING OFFICE	
RETURN TO SECRETARY OF STATE		RETURN TO SECRETARY OF STATE	
OFFICE NO. 3811		STREET NO. 1655	
INSURED NO.		CITY, ZONE AND STATE	