HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS
SUITE 622 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON, JR
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
W. C. BOONE, JR.
DONALD F. PIERCE

MAILING ADDRESS:
P. O. BOX 123
CABLE ADDRESS:
H A B
TELEPHONE:
HEMLOCK 2-5514

December 4, 1959

3968

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

Re: Juan G. Trevino, Jr., a minor, v. Juan Hernandez,
Case No. 3967
Juan G. Trevino, Sr. v. Juan Hernandez,
Case No. 3968
In the Circuit Court of Baldwin County, Alabama.

Dear Miss Duck:

On September 10, 1959, the Secretary of State sent registered notices, together with copies of the summons and complaints to Juan Hernandez, the defendant in the above styled causes. This service was perfected pursuant to Title 7, Sec. 199, the Non-Resident Motorist Statute.

Since that time, I have learned that service should have been perfected on Juan Hernandez pursuant to Title 7, Sec. 199(1), in the pocket part. Accordingly, enclosed are the original and four copies of the required affidavit for each case. Also enclosed are four additional copies of the complaints in each case.

I would greatly appreciate your forwarding the original writ or process and three copies thereof, together with three copies of the complaints with affidavit attached, to the Sheriff of Montgomery County for service on the Secretary of State, in accordance with Title 7, Sec. 199(1).

Enclosed is our check for $6.00 to cover the fee for this service. If this amount is incorrect, please advise

and we will correct accordingly.

Many thanks for your assistance.

Yours very truly,

W. C. Bone Jr.

For the Firm

WCB.cmb
Encs.

January 4, 1960

JUAN G. TREVINO, SR., Plaintiff
VS.
JUAN HERNANDEZ, Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

CASE NO. 3968

STATE OF ALABAMA
MONTGOMERY COUNTY

Before me, Nancy H. Turner, a Notary Public in and for said State-at-Large, personally appeared Bettye Frink, Secretary of State of the State of Alabama, who is known to me and who, being duly sworn, deposes and says that in her official capacity as Secretary of State of the State of Alabama she, on the 18 day of December 1959 sent by registered mail in an envelope addressed as follows:

"Juan Hernandez
Plaska Rural Station
Memphis, Texas"

"Registered Mail—
Return Receipt Requested
Deliver to Addressee only"

bearing sufficient and proper prepaid postage, a notice bearing her signature and the Great Seal of the State of Alabama in words and figures as follows:

"
Juan Hernandez
Plaska Rural Station
Memphis, Texas

You will take notice that on December 18, 1959 the Sheriff of Montomery County, Alabama, served upon me, in my official capacity, Summons and Complaint and Affidavit in a case entitled: JUAN G. TREVINO, SR., Plaintiff VS JUAN HERNANDEZ, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 3968
a true copy of which Summons and Complaint and Affidavit are 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, said service being under provisions of Title 7, Section 199(1) of the 1940 Code of Alabama and Supplement thereto.

WITNESS MY HAND and the Great Seal of the State of Alabama this the 18 day of December 1959

(Signed) Bettye Frink
Bettye Frink
Secretary of State

Enclosures (2)

Affiant further says 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 and Affidavit in the above-styled cause.

Affiant further says that on Dec 28 1959 she received the "Return Card" showing receipt by the designated addressee of the aforementioned matter at Robstown Tex. on Date Not Given

Bettye Frink
Affiant—Bettye Frink
Secretary of State

Sworn to and subscribed before me, this the 4 day of January 1960

Nancy H. Turner
Notary Public—State-at-Large
My Commission expires: 10-17-62

Enclosures—"Return Receipt" and
Copy of Process
cc: Honorable W. C. Boone, Jr.
Hand, Arendall, Bedsone, Greaves & Johnston
Attorneys at Law
Suite 622, First National Bank Bldg.
Mobile, Alabama

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 3968

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JUAN HERNANDEZ

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

JUAN HERNANDEZ, Defendant

by JUAN G. TREVINO, SR.

_____, Plaintiff

Witness my hand this 5th day of December 1959

Eric J. Heck, Clerk

No. 3960 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

JUAN G. TREVINO, SR.
Plaintiffs

vs.

JUAN HERNANDEZ

Defendants

Summons and Complaint

Filed December 5, 1959

Alice J. Duck 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

JUAN G. TREVINO, SR.,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
Vs.	:	
		AT LAW
JUAN HERNANDEZ,	:	
		CASE NO. 3968
Defendant.	:	

A F F I D A V I T

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, the undersigned Notary Public in and for said county, in said state, personally appeared W. C. BOONE, JR., the attorney of record for JUAN G. TREVINO, SR. in the above cause, who, first being duly sworn, on oath deposes and says:

That he is the attorney of record for JUAN G. TREVINO, SR., plaintiff in the above styled cause, which is now pending in the Circuit Court of Baldwin County, Alabama.

Affiant further avers that he is informed and believes and based upon such information and belief doth aver that at the time of the accident referred to in the complaint, to-wit, June 6, 1959, the defendant in said cause, JUAN HERNANDEZ, was a non-resident of the State of Alabama and a resident citizen of Texas, his exact address at said time being unknown to affiant; that on, to-wit, June 6, 1959, the said JUAN HERNANDEZ was doing work and/or performing services in the State of Alabama and was not qualified under the Constitution and laws of the State of Alabama as to doing business herein; that at said time, he was working

on the "Weeks Farm" at or near Magnolia Springs, Baldwin County, Alabama, driving a truck carrying potato pickers to and from the fields on said farm; and that he was engaged in other work at said place, the nature of which is unknown to affiant.

Affiant is informed and believes and based upon such information and belief doth aver that Title 7, Sec. 199(1) 1940 CODE OF ALABAMA, as amended, is applicable to the case at bar.

Affiant further states that he is informed and believes and based upon such information and belief doth aver that the said JUAN HERNANDEZ was involved in the accident which caused the injuries to JUAN G. TREVINO, JR., as alleged in the bill of complaint in the above styled cause; that JUAN HERNANDEZ is not a resident of the State of Alabama, but that he is a resident of the State of Texas, his last known address being Plaska Rural Station, Memphis, Texas.

W. C. Brown Jr.
Affiant

Subscribed and sworn to before me this 14th day of December, 1959.

Claudia M. Burden
Notary Public, Mobile County, Alabama.

FILED
DEC 16 1959
ALICE J. DUCK, CLERK
REGISTER

JUAN G. TREVINO, SR.,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
Vs.	:	
	:	AT LAW
JUAN HERNANDEZ,	:	
	:	CASE NO. 3968
Defendant.	:	

A F F I D A V I T

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, the undersigned Notary Public in and for said county, in said state, personally appeared W. C. BOONE, JR., the attorney of record for JUAN G. TREVINO, SR. in the above cause, who, first being duly sworn, on oath deposes and says:

That he is the attorney of record for JUAN G. TREVINO, SR., plaintiff in the above styled cause, which is now pending in the Circuit Court of Baldwin County, Alabama.

Affiant further avers that he is informed and believes and based upon such information and belief doth aver that at the time of the accident referred to in the complaint, to-wit, June 6, 1959, the defendant in said cause, JUAN HERNANDEZ, was a non-resident of the State of Alabama and a resident citizen of Texas, his exact address at said time being unknown to affiant; that on, to-wit, June 6, 1959, the said JUAN HERNANDEZ was doing work and/or performing services in the State of Alabama and was not

qualified under the Constitution and laws of the State of Alabama as to doing business herein; that at said time, he was working on the "Weeks Farm" at or near Magnolia Springs, Baldwin County, Alabama, driving a truck carrying potato pickers to and from the fields on said farm; and that he was engaged in other work at said place, the nature of which is unknown to affiant.

Affiant further states that he is informed and believes and based upon such information and belief doth aver that the said JUAN HERNANDEZ was involved in the accident which caused the injuries to JUAN G. TREVINO, JR., as alleged in the bill of complaint in the above styled cause; that JUAN HERNANDEZ is not a resident of the State of Alabama, but that he is a resident of the State of Texas, his last known address being Flaska Rural Station, Memphis, Texas.

W. C. Boone Jr.
Affiant

Subscribed and sworn to before me this 4th day of December, 1959.

Claudia M. Burden
Notary Public, Mobile County, Alabama.

JUAN C. TERRIO, SR.,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY,
vs.	)	ALABAMA
JUAN HERNANDEZ,	)	AT LAW
Defendant.	)	CASE NO. _____

COUNT ONE

The plaintiff claims of the defendant THIRTEEN THOUSAND DOLLARS ($13,000.00) as damages, for that heretofore, on, to-wit, June 6, 1979, the defendant did so negligently operate a motor truck across and over, to-wit, a dirt road which ran through a field of the "Weeks Farm" at or near, to-wit, Magnolia Springs, Baldwin County, Alabama, so as to cause the rear wheels of said motor truck to run over and upon the plaintiff's seven year old son, Juan C. Terrio, Jr., who was riding in said motor truck, with the plaintiff. Plaintiff further avers that he had been employed by the defendant's employer to pick potatoes on the "Weeks Farm", and that the said Juan C. Terrio, Jr. had been accompanying the plaintiff and assisting the plaintiff in his work, with the knowledge and consent of the defendant; that immediately prior to said accident Juan C. Terrio, Jr. had himself been picking potatoes for the defendant's employer, and had been assisting the plaintiff and assisting the defendant in and about their work on the "Weeks Farm"; and plaintiff avers that by virtue of the above, the said Juan C. Terrio, Jr.'s transportation in said motor truck at said time and place tended to promote the mutual interests of both Juan C. Terrio, Jr., the defendant and the plaintiff; and that his carriage in said motor truck thereby conferred a benefit on the defendant.

Plaintiff further avers that as a direct and proximate result and consequence of said negligence of the defendant, the said Juan G. Treviño, Jr. was permanently injured in that: He was made sick and sore; he suffered and continues to suffer severe physical pain and mental anguish; he suffered lacerations [illegible] his bladder became distended and sore; his bladder became distended; he suffered perforation of the abdomen; he suffered a fracture of the right ilium; he suffered a fracture of the conjoined rami; he suffered a separation of the symphysis pubis; he suffered a separation of the right sacro-iliac joint; he was otherwise permanently injured; and plaintiff was forced to incur numerous reasonable and necessary doctors, hospital, medical, drug, x-ray and nursing expenses in and about the treatment of the injuries which his said minor son received, and the plaintiff alleges that he will be forced to incur additional reasonable and necessary hospital, doctor, medical, drug, x-ray and nursing expenses in the future in and about the treatment of the injuries which his said minor son received, and that he lost the services of his son until age twenty-one, all as a direct and proximate result and consequence of said negligence. Hence this suit.

COUNT TWO

The plaintiff claims of the defendant FIFTEEN THOUSAND DOLLARS ($15,000.00) as damages, for that heretofore on, to-wit, June 6, 1959, the defendant wrongly injured Juan G. Treviño, Jr., the plaintiff's seven year old son, by wrongly operating a motor truck across and over, to-wit, a dirt road which ran through a field on the "Yeoda Farm", at or near, to-wit, Hayette Springs, Baldwin County, Alabama, so as to cause the rear wheels of said

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DEC 13 1923
RECEIVED

[illegible] struck to run over and upon the said [illegible] and as a direct and proximate result and consequence thereof, the said John D. Keeling, Jr. was [illegible] to stop. He was made sick and sore; he suffered [illegible] severe physical pain and mental anguish; [illegible] the nature, extent and duration of the said injuries are not [illegible] and abdomen; he suffered a fracture of the right femur; he suffered a dislocation of the coxofemoral joint; he suffered a separation of the symphysis pubis; he suffered a separation of the right sacroiliac joint; he was otherwise permanently injured; and plaintiff was forced to incur numerous reasonable and necessary doctor, hospital, medical, drug, x-ray and nursing expenses in and about the treatment of the injuries which the said John D. Keeling, Jr. received, and the said plaintiff alleges that he will be forced to incur additional reasonable and necessary hospital, doctor, medical, drug, x-ray and nursing expenses in the future in and about the treatment of the injuries which the said John D. Keeling, Jr. received, and that he has lost the services of his son, which are worth, and, all as a direct and proximate result and consequence of said collision and injuries the said John D. Keeling, Jr. received.

By W. C. Bond
Attorney for Plaintiff

Plaintiff demands a trial by jury.
W. C. Bond

OF COUNSEL:
HUFF, FERGUS, BARKER, GRAVES & JOHNSON

[illegible] the Secretary of State, under the provisions of Rule 7, [illegible] 1947 [illegible] amended.

Defendant's address is:
Uncle Sam Station-Naylor, Iowa

Plaintiff demands a trial by jury.
W. C. Bond

RECEIVED
DEC 13 1999
SECRETARY OF
STATE

JUAN G. TREVINO, SR.,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
Vs.	:	
		AT LAW
JUAN HERNANDEZ,	:	
		CASE NO. 3968
Defendant.	:	

A F F I D A V I T

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, the undersigned Notary Public in and for said county, in said state, personally appeared W. C. BOONE, JR., the attorney of record for JUAN G. TREVINO, SR. in the above cause, who, first being duly sworn, on oath deposes and says:

That he is the attorney of record for JUAN G. TREVINO, SR., plaintiff in the above styled cause, which is now pending in the Circuit Court of Baldwin County, Alabama.

Affiant further avers that he is informed and believes and based upon such information and belief doth aver that at the time of the accident referred to in the complaint, to-wit, June 6, 1959, the defendant in said cause, JUAN HERNANDEZ, was a non-resident of the State of Alabama and a resident citizen of Texas, his exact address at said time being unknown to affiant; that on, to-wit, June 6, 1959, the said JUAN HERNANDEZ was doing work and/or performing services in the State of Alabama and was not qualified under the Constitution and laws of the State of Alabama as to doing business herein; that at said time, he was working

on the "Weeks Farm" at or near Magnolia Springs, Baldwin County, Alabama, driving a truck carrying potato pickers to and from the fields on said farm; and that he was engaged in other work at said place, the nature of which is unknown to affiant.

Affiant is informed and believes and based upon such information and belief doth aver that Title 7, Sec. 199(1) 1940 CODE OF ALABAMA, as amended, is applicable to the case at bar.

Affiant further states that he is informed and believes and based upon such information and belief doth aver that the said JUAN HERNANDEZ was involved in the accident which caused the injuries to JUAN G. TREVINO, JR., as alleged in the bill of complaint in the above styled cause; that JUAN HERNANDEZ is not a resident of the State of Alabama, but that he is a resident of the State of Texas, his last known address being Plaska Rural Station, Memphis, Texas.

W. C. Boone Jr.
Affiant

Subscribed and sworn to before me this 14th day of December, 1959.

Claudia M. Burden
Notary Public, Mobile County, Alabama.

FILED
DEC 16 1959
ALICE L. DUCK, CLERK
REGISTER

JUAN G. TREVINO, SR.,	:	IN THE CIRCUIT COURT OF
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
Vs.	:	
	:	AT LAW
JUAN HERNANDEZ,	:	
	:	CASE NO. 3968
Defendant.	:	

A F F I D A V I T

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, the undersigned Notary Public in and for said county, in said state, personally appeared W. C. BOONE, JR., the attorney of record for JUAN G. TREVINO, SR. in the above cause, who, first being duly sworn, on oath deposes and says:

That he is the attorney of record for JUAN G. TREVINO, SR., plaintiff in the above styled cause, which is now pending in the Circuit Court of Baldwin County, Alabama.

Affiant further avers that he is informed and believes and based upon such information and belief doth aver that at the time of the accident referred to in the complaint, to-wit, June 6, 1959, the defendant in said cause, JUAN HERNANDEZ, was a non-resident of the State of Alabama and a resident citizen of Texas, his exact address at said time being unknown to affiant; that on, to-wit, June 6, 1959, the said JUAN HERNANDEZ was doing work and/or performing services in the State of Alabama and was not

qualified under the Constitution and laws of the State of Alabama as to doing business herein; that at said time, he was working on the "Weeks Farm" at or near Magnolia Springs, Baldwin County, Alabama, driving a truck carrying potato pickers to and from the fields on said farm; and that he was engaged in other work at said place, the nature of which is unknown to affiant.

Affiant further states that he is informed and believes and based upon such information and belief doth aver that the said JUAN HERNANDEZ was involved in the accident which caused the injuries to JUAN G. TREVINO, JR., as alleged in the bill of complaint in the above styled cause; that JUAN HERNANDEZ is not a resident of the State of Alabama, but that he is a resident of the State of Texas, his last known address being Plaska Rural Station, Memphis, Texas.

W. C. Boone Jr.
Affiant

Subscribed and sworn to before me this 4th day of December, 1959.

Claudia M. Burke
Notary Public, Mobile County, Alabama.

FILED
DEC 5 1959
ALICE D. DUCK, CLERK REGISTER

JUAN G. TREVINO, SR.,	)	IN THE CIRCUIT COURT OF
	)	
Plaintiff,	)	BALDWIN COUNTY,
	)	
Vs.	)	ALABAMA
	)	
JUAN HERNANDEZ,	)	AT LAW
	)	
Defendant.	)	CASE NO. 3968

COUNT ONE

The plaintiff claims of the defendant FIFTEEN THOUSAND DOLLARS ($15,000.00) as damages, for that heretofore, on, to-wit, June 6, 1959, the defendant did so negligently operate a motor truck across and over, to-wit, a dirt road which ran through a field on the "Weeks Farm" at or near, to-wit, Magnolia Springs, Baldwin County, Alabama, so as to cause the rear wheels of said motor truck to run over and upon the plaintiff's seven year old son, Juan G. Trevino, Jr., who was riding in said motor truck, with the plaintiff. Plaintiff further avers that he had been employed by the defendant's employer to pick potatoes on the "Weeks Farm", and that the said Juan G. Trevino, Jr. had been accompanying the plaintiff and assisting the plaintiff in his work, with the knowledge and consent of the defendant; that immediately prior to said accident Juan G. Trevino, Jr. had himself been picking potatoes for the defendant's employer, and had been assisting the plaintiff and assisting the defendant in and about their work on the "Weeks Farm"; and plaintiff avers that by virtue of the above, the said Juan G. Trevino, Jr.'s transportation in said motor truck at said time and place tended to promote the mutual interests of both Juan G. Trevino, Jr., the defendant and the plaintiff; and that his carriage in said motor truck thereby conferred a benefit on the defendant.

Plaintiff further avers that as a direct and proximate result and consequence of said negligence of the defendant, the said Juan G. Trevino, Jr. was permanently injured in that: He was made sick and sore; he suffered and continues to suffer severe physical pain and mental anguish; he suffered diaphragmatic splinting of the chest; his abdomen became distended and tense; his bladder became distended; he suffered peristalsis of the abdomen; he suffered a fracture of the right ilium; he suffered a fracture of the conjoined ramus; he suffered a separation of the symphysis pubis; he suffered a separation of the right sacroiliac joint; he was otherwise permanently injured; and plaintiff was forced to incur numerous reasonable and necessary doctors, hospital, medical, drug, x-ray and nursing expenses in and about the treatment of the injuries which his said minor son received, and the plaintiff alleges that he will be forced to incur additional reasonable and necessary hospital, doctor, medical, drug, x-ray and nursing expenses in the future in and about the treatment of the injuries which his said minor son received, and that he lost the services of his son until age twenty-one, all as a direct and proximate result and consequence of said negligence. Hence this suit.

COUNT TWO

The plaintiff claims of the defendant FIFTEEN THOUSAND DOLLARS ($15,000.00) as damages, for that heretofore on, to-wit, June 6, 1959, the defendant wantonly injured Juan G. Trevino, Jr., the plaintiff's seven year old son, by wantonly operating a motor truck across and over, to-wit, a dirt road which ran through a field on the "Weeks Farm", at or near, to-wit, Magnolia Springs, Baldwin County, Alabama, so as to cause the rear wheels of said

motor truck to run over and upon the said Juan G. Trevino, Jr., and as a direct and proximate result and consequence of said wantonness, the said Juan G. Trevino, Jr. was permanently injured in that: He was made sick and sore; he suffered and continues to suffer severe physical pain and mental anguish; he suffered diaphragmatic splinting of the chest; his abdomen became distended and tense; his bladder became distended; he suffered peristalsis of the abdomen; he suffered a fracture of the right ilium; he suffered a fracture of the conjoined ramus; he suffered a separation of the symphysis pubis; he suffered a separation of the right sacroiliac joint; he was otherwise permanently injured; and plaintiff was forced to incur numerous reasonable and necessary doctors, hospital, medical, drug, x-ray and nursing expenses in and about the treatment of the injuries which his said minor son received, and the plaintiff alleges that he will be forced to incur additional reasonable and necessary hospital, doctor, medical, drug, x-ray and nursing expenses in the future in and about the treatment of the injuries which his said minor son received, and that he lost the services of his son until age twenty-one, all as a direct and proximate result and consequence of said negligence. Hence this suit.

By W. C. Boone, Jr.
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served by service on the Secretary of State under the provisions of Title 7, Section 199, 1940 Code of Alabama.

Defendant's address is:

Highway 44, General Delivery,
Robstown, Texas

Plaintiff demands a trial by jury.
W. C. Boone, Jr.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

No. 3968

Circuit Court, Baldwin County

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JUAN HERNANDEZ

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

JUAN HERNANDEZ, Defendant

by JUAN G. TREVINO, SR.

_____, Plaintiff

Witness my hand this 8th day of September 19 59

Alice J. Nuck, Clerk

2081 1467

No. 3968 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

JUAN G. TREVINO, SR.

Plaintiffs

vs.

JUAN HERNANDEZ

Defendants

Summons and Complaint

Filed September 8, 1959

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE SEP 10 1959 M. S. BUTLER, Sheriff

Received In Office

19

Sheriff

I have executed this summons

this 19

by leaving a copy with

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

This the 10 day of Sept. 1959

Sheriff of Montgomery County

M. S. Butler,

By Romeo D. S.

The Sheriff claims 2 miles at 10c per mile for a total of $ .20

M. S. Butler, Sheriff
Montgomery County, Ala.

Sheriff

Deputy Sheriff