

STATE OF ALABAMA,

BALDWIN COUNTY.

IN THE CIRCUIT COURT-LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert L. Burke and Mrs. Robert L. Burke 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 Ruby Greek, as Special Administratrix of the Estate of Aden Greek, Deceased.

Witness my hand this 3 day of November, 1951.

T. W. Richardson
Clerk.

COMPLAINT.

RUBY GREEK, As Special Administratrix of the Estate of Aden Greek, Deceased,

Plaintiff,

-vs-

ROBERT L. BURKE, and MRS.
ROBERT L. BURKE,

Defendants.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

1st. The Plaintiff, as Special Administratrix of the Estate of Aden Greek, Deceased, claims of the Defendants the sum of Twenty-five Thousand Dollars (\$25,000.00), as damages, for in this: That on, to-wit, the 30th day of October, 1951, one of the Defendants, Robert L. Burke, while operating an automobile, the property of Mrs. Robert L. Burke, for and as the agent of the said Mrs. Robert L. Burke, and while acting within the line and scope of his agency, along that certain highway leading from Robertsdale, Alabama, to Pensacola, Florida, and at a point about three miles west of the Florida-Alabama Boundary Line, negligently ran said car, or the car that he was operating, into and against an automobile truck that Plaintiff's intestate, Aden Greek, was then and there riding, and that by reason of said negligence on the part of said Defendant, Robert L. Burke, the car in which the Plaintiff's intestate was riding was turned over.

upon and against Plaintiff's intestate, causing his death--hence this suit.

2nd. The Plaintiff, as Special Administratrix of the Estate of Aden Greek, Deceased, claims of the Defendants the further sum of Twenty-five Thousand Dollars (\$25,000.00). as damages, for in this: That on, to-wit, the 30th day of October, 1931, one of the Defendants, Robert L. Burke, while operating an automobile, the property of Mrs. Robert L. Burke, for and as the agent of the said Mrs. Robert L. Burke, and while acting within the line and scope of his agency, along that certain highway leading from Robertsdale, Alabama, to Pensacola, Florida, and at a point about three miles west of the Florida-Alabama Boundary Line, wantonly ran said car, or the car that he was operating, into and against an automobile truck that Plaintiff's intestate, Aden Greek, was then and there riding, and that by reason of said wantonness on the part of said Defendant, Robert L. Burke, the car in which the Plaintiff's intestate was riding was turned over, upon and against Plaintiff's intestate, causing his death--hence this suit.

Hybert Kent Chason
Attorneys for Plaintiff.

Plaintiff demands trial by
Jury.

Hybert Kent Chason
Attorneys for Plaintiff.

RUBY GREEK, as Special adminis-
tratrix of the Estate of Aden
Greek, deceased,

Plaintiff,

vs-

ROBERT L. BURKE, and MRS. ROBERT
L. BURKE,

Defendants.

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

THIS CAUSE, coming on for hearing, upon application of the defendants herein for an order transferring the cause to the United States District Court for the Southern Division of the Southern District of Alabama, at Mobile, Alabama, and it appearing to the Court that the defendants have filed their petition for such removal in due form of law, and have also filed their bond duly conditioned, with good and sufficient sureties, as provided by law, and it appearing to the Court that this is a proper cause for removal to said District Court;

NOW, THEREFORE, it is hereby ordered, adjudged, and decreed that this cause be and is hereby removed to the said District Court of the United States for the Southern Division of the Southern District of Alabama, at Mobile, Alabama, and the Clerk is hereby directed to make up a certified copy of the record in said cause for transmission to the said District Court forthwith.

Dated this 28th day of November, 1931.

G. W. Hare
Judge of the Circuit Court of Baldwin
County, Alabama.

RUBY GREEK, as Special Adminis- :
tratrix of the Estate of Aden :
Greek, deceased, :

Plaintiff, : IN THE CIRCUIT COURT OF
-vs- : BALDWIN COUNTY, ALABAMA.

ROBERT L. BURKE and MRS. ROBERT : AT LAW.
L. BURKE, :

Defendants. :
:

Come your petitioners, Robert L. Burke and Mrs.
Robert L. Burke, the defendants in the above styled
cause, and show unto this Honorable Court:

That the plaintiff in this suit was, at the
time of the commencement of the suit, and ever since
has been, and now is, a resident of the State of Alabama;
that, at the time of the commencement of this suit, and
ever since, the defendants were, and still are, citizens
of the State of Florida, with their residence in said
State; that the amount in dispute in the above entitled
cause exceeds the sum of Twenty-five Hundred Dollars
(\$2500.00), excessive of costs and interest, and that
said suit was, at the time of the filing thereof, and
still is, between citizens of different states; that
the time required by law for answering and pleading to
the complaint in such cause, under the laws of the State
of Alabama, and the rules of the Circuit Court of Baldwin
County, Alabama, has not yet expired.

Your petitioners herewith tender good and suf-
ficient bond, as required by law, to remove said cause,
and have given the adverse party, through his attorneys
of record, due notice of their intention to file this
petition.

WHEREFORE, your petitioners pray that this
Honorable Court proceed no further herein, except to
make the order of removal by law, and to accept and
approve the surety bond herewith tendered, and to cause
the record herein to be filed in the United States

District Court for the Southern Division of the Southern
District of Alabama, in which said district the County
of Baldwin, State of Alabama, is embraced.

ROBERT L. BURKE, and MRS. ROBERT L.
BURKE,

By Smith & Johnston
Their Attorneys.

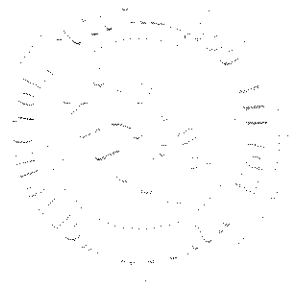
STATE OF ALABAMA,

COUNTY OF MOBILE.

Personally appeared before me, Vivian Worthington,
a Notary Public in and for said state and county, P. C.
Fountain, who, being by me first duly sworn, deposes and
says that he is one of the attorneys for the petitioners
in the above styled cause, and, as such, is duly authoriz-
ed to make this affidavit in their behalf, and that the
statements contained in the foregoing petition are true.

J. L. Fountain
Subscribed and sworn to before me this 25th day
of November, 1931.

Vivian Worthington
Notary Public, Mobile County, Alabama.



RUBY GREEK, as Special Adminis- :
tratrix of the Estate of Aden :
Greek, deceased, :

Plaintiff, : IN THE CIRCUIT COURT OF

-vs-

: BALDWIN COUNTY, ALABAMA.

ROBERT L. BURKE and MRS. ROBERT :
L. BURKE, :

AT LAW.

Defendants. :

TO MESSRS. HYBART, HEARD AND CHASON, Attorneys of Record
for plaintiff in the above styled cause;

Please take notice that the defendants in the
above styled cause intend to, and will, on the 25 day
of November, 1931, file in the Circuit Court of
Baldwin County, Alabama, a petition and bond in the form
hereto attached for the removal of said cause to the
District Court of the United States for the Southern
Division of the Southern District of Alabama, and will,
as soon thereafter as counsel can be heard, move the
Court for an order removing said cause to the District
Court of the United States for the Southern Division of
the Southern District of Alabama.

Dated this 25 day of November, 1931.

Smith & Johnston
Attorneys for Defendants.

We hereby accept service of a copy of the above
and foregoing notice, together with a copy of the petition
and bond referred to therein, and waive further notice of
said petition and bond, and defendants' intention to file
the same, and of the filing of said petition and bond, and
consent that said petition for the removal of said cause
be heard by the Judge of the Circuit Court of Baldwin
County, Alabama, without further notice to us.

Dated this 25th day of November, 1931.

Hybart, Heard & Chason
Attorneys for Plaintiff,

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Filed Nov 25. 1931
J. W. Rieken
J. W. Rieken

TO THE HONORABLE CHIEF OF BUREAU OF LANDS
WASHINGTON, D. C.

RE: [Illegible]

[The following text is extremely faint and largely illegible due to the quality of the scan. It appears to be a letter or report detailing land matters, possibly related to the Bureau of Land Management.]

[Illegible text continues]

RUBY GREEK, as Special Adminis- :
tratrix of the Estate of Aden :
Greek, deceased, :

Plaintiff, :

-vs- :

ROBERT L. BURKE, and MRS. ROBERT :
L. BURKE, :

Defendants. :

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

KNOW ALL MEN BY THESE PRESENTS, that Robert L. Burke and Mrs. Robert L. Burke, citizens of the State of Florida, as principals, and the Home Indemnity Company of New York, as surety, are held and firmly bound unto the above named plaintiff, in the penal sum of Five Hundred Dollars (\$500.00) for the payment of which well and truly to be made, we bind ourselves, our successors and assigns jointly and severally, firmly by these presents. Yet, upon this condition, that the said Robert L. Burke and Mrs. Robert L. Burke have filed their petition in this Court for the removal of said above entitled cause to the District Court of the United States, for the Southern Division of the Southern District of Alabama, at Mobile, Alabama; now, if the said Robert L. Burke and Mrs. Robert L. Burke shall enter in the said District Court of the United States, in Mobile, Alabama, within thirty days after the filing of said petition, a certified copy of the record in said suit, and shall well and truly pay all costs that may be inserted by the District Court of the United States, if said court shall hold that said suit was wrongfully or improperly removed thereto, then this obligation to be void; otherwise, it shall remain in full force and effect.

WITNESS our hands this 25th day of November, 1931.

ROBERT L. BURKE AND MRS. ROBERT
L. BURKE,

By Smith & Johnston
Their Attorneys.

HOME INDEMNITY COMPANY OF NEW YORK,

By Loa M. Allen,
Attorneys-in-fact.

Approved Bur. 28th 1931
F. W. Hare
Circuit Judge