

GRACE L. WILLIAMSON,
Plaintiff,

VS

MALBIS PLANTATION, INC.,
and A. N. KALASOUNTAS,
jointly and severally,
Defendants.

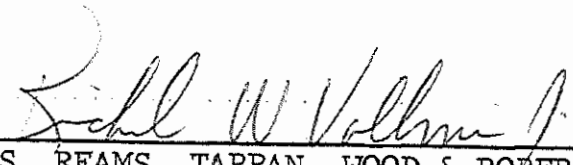
IN THE CIRCUIT COURT
OF BALDWIN COUNTY
ALABAMA

AT LAW

CASE NO. 4360

COMPLAINT

Plaintiff claims of the defendants, and each of them, the sum of Two Thousand Two Hundred and no/100 (\$2,200.00) Dollars, as damages, for that heretofore and on, to-wit, August 1, 1959, while the plaintiff's automobile was being operated in a westerly direction on United States Highway 90, a public thoroughfare in the County of Baldwin, State of Alabama, at a point, to-wit about one and one-half miles west of Malbis Restaurant, the defendant, A. N. Kalasountas, an agent, servant, or employee of the defendant, Malbis Plantation, Inc., while acting in the line and scope of his employment as such, so negligently operated a vehicle as to cause it to run into, upon or against the plaintiff's automobile and as a proximate consequence thereof, the plaintiff was injured and damaged in this: Her automobile was torn, mashed, bent, and rendered a total loss, for all of which plaintiff claims damages as aforesaid.


for PILLANS, REAMS, TAPPAN, WOOD & ROBERTS
Attorneys for Plaintiff

Defendant A. N. Kalasountas may be served:

% Malbis Plantation, Inc.
Highway 90 East

Service on:

Defendant Malbis Plantation, Inc. may be had by service on an officer of the Corporation:

% Malbis Plantation, Inc.
Highway 90 East

FILED

AUG 1 1960

ALICE J. DUCK, CLERK
REGISTER

4360

Grace L. Williamson

Vs

Malbis Plantation

Received 1 day of Aug 19 60
d on 4 day of Aug 19 60
Received a copy of the within B & C
Malbis Plantation
service on Mr. Lorn Matthews

TAYLOR WILKINS, Sheriff

By W. C. Garner, S.

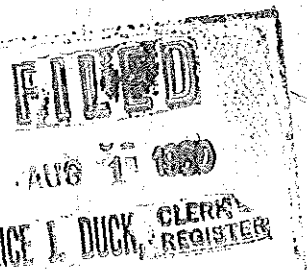
Malbis

Sheriff claims 40 miles at 40c

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Garner
DEPUTY SHERIFF



MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY
ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING
HEMLOCK 3-5561 P. O. BOX 1070
MOBILE 6, ALABAMA

GESSNER T. MCCORVEY
BEN O. TURNER
C. A. L. JOHNSTONE, JR.
R. F. ADAMS
JAMES L. MAY, JR.
ALEX T. HOWARD, JR.
J. JEPHTHA HILL
CHARLES B. BAILEY, JR.
C. M. A. ROGERS, III

January 13, 1961

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

Re: Grace Williamson vs.
Malbis Plantation, Inc., et al
Case No. 4360

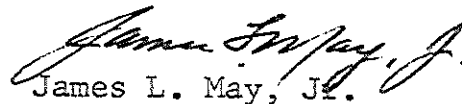
Dear Mrs. Duck:

Enclosed is a letter dated January 12, 1961, addressed to you, written by the attorneys for the plaintiff in the above cause, requesting that such case be dismissed with prejudice. Also enclosed is our check No. 51644 payable to you. When the court costs have been ascertained by you, please insert the amount of court costs in the check and also in the enclosed certificate of dismissal. We would appreciate very much your then returning to us the enclosed certificate, in duplicate, as well as the bill of costs shown to have been paid.

Mr. J. B. Blackburn represents the defendants in the above cause in the matter of suits filed by them against the above plaintiff, and we understand from Mr. Blackburn today that he will dismiss those two suits filed by him.

We shall greatly appreciate your courtesy in this matter.

Yours very truly,


James L. May, Jr.

JLM, Jr./lgn
enclosures

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS
LAWYERS AND PROCTORS
VAN ANTWERP BUILDING
P. O. BOX 935
MOBILE 5, ALABAMA

PALMER PILLANS
W. DEWITT REAMS
JOHN H. TAPPAN
GEORGE F. WOOD
BONNERRAE H. ROBERTS
RICHARD W. VOLLMER, JR.
ABRAM L. PHILIPS, JR.
FRED W. KILLION, JR.
HUBERT P. ROBERTSON

CABLE ADDRESS: PTAH

January 12, 1961

Mrs. Alice J. Duck
Clerk of the Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

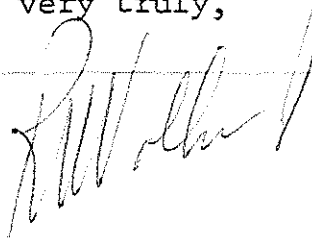
RE: Williamson vs Malbis Plantation,
Inc., etc. Case No. 4360

Dear Mrs. Duck:

This case has been settled to the satisfaction of the parties and we request that the above law suit be dismissed with prejudice. We ask that the costs be taxed to the defendant and a cost bill sent to Attorney James L. May at the law firm of McCorvey, Turner, Johnstone, Adams & May.

Thank you for your cooperation in this matter.

Yours very truly,



for PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

RWVjr/jap

GRACE L. WILLIAMSON,
Plaintiff,
VS.
MALBIS PLANTATION, INC.,
et al.,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
NO. 4360

ANSWER

Now come the defendants, each separately and severally,
and for answer to the complaint say:

1. Not guilty.

J. T. Blackburn
Attorney for Defendants

Defendants demand a trial of
said cause by jury.

J. T. Blackburn
Attorney for Defendants

FILED

SEP 22 1960

ALICE J. DICKSON
CLERK
REGISTER

ANSWER

GRACE L. WILLIAMSON,

Plaintiff,
VS.

MALBIS PLANTATION, INC., ET AL.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 4360

PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

LAWYERS AND PROCTORS

VAN ANTWERP BUILDING

P. O. BOX 935

MOBILE 5, ALABAMA

PALMER PILLANS
W. DEWITT REAMS
JOHN H. TAPPAN
GEORGE F. WOOD
BONNERRAE H. ROBERTS
RICHARD W. VOLLMER, JR.

ABRAM L. PHILIPS, JR.
FRED W. KILLION, JR.
HUBERT P. ROBERTSON

CABLE ADDRESS: PTAH

July 30, 1960

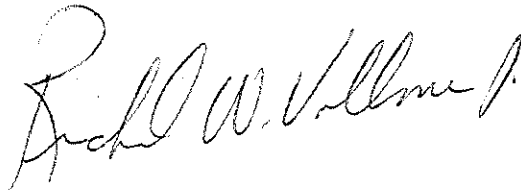
Circuit Court of Baldwin County, Alabama
Alice Duck, Clerk
County Courthouse
Bay Minette, Alabama

Dear Mrs. Duck:

We enclose herewith the original and two copies of summons and complaint of Grace L. Williamson vs Malbis Plantation, Inc. and A. N. Kalasountas; that we wish to file in Circuit Court of Baldwin County, Alabama.

Thank you for your cooperation in this regard.

Yours very truly,



for PILLANS, REAMS, TAPPAN, WOOD & ROBERTS

RWVjr/jap
Enclosures

STATE OF ALABAMA)

COUNTY OF BALDWIN)

To any Sheriff of the State of Alabama - GREETING:

You are hereby commanded to summon A. N. Kalasountas, to appear before the Circuit Court of Baldwin County, Alabama, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of Grace L. Williamson.

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this the 1 day of Aug, 1960.

Alice J. Drake
Circuit Clerk

STATE OF ALABAMA)

COUNTY OF BALDWIN)

To any Sheriff of the State of Alabama - GREETING:

You are hereby commanded to summon Malbis Plantation, Inc., to appear before the Circuit Court of Baldwin County, Alabama, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of Grace L. Williamson.

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this the 1 day of Aug, 1960.

Alice J. Drake
Circuit Clerk