

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

January 30, 1962

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Re: L. Irwin & Son
vs: Holman
Case # 4533

Dear Mrs. Duck:

This judgment has been paid by the defendant and the case is closed.

With best wishes, I am,

Cordially yours,

FOREST A. CHRISTIAN

October 5, 1960

JAMES U. WILKINSON, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

FRED B. BIMEL, et al, Defendants

CASE NO. 4433

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

I, Bettye Frink, Secretary of State, hereby certify that on September 26, 1960
I sent by registered mail in an envelope addressed as follows:

"Fred B. Bimel
3107 Country Club Drive
Shreveport, La."

"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:

"Fred B. Bimel
3107 Country Club Drive
Shreveport, La."

You will take notice that on September 26, 1960 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: JAMES U. WILKINSON, Plaintiff VS FRED B. BIMEL, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 4433 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 26
day of September 1960

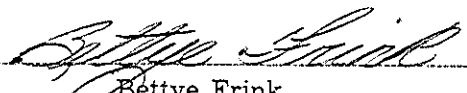
Enclosure (1)

(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 October 3, 1960 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Shreveport, La.
on 9-30-60

WITNESS MY HAND and the Great Seal of the State of Alabama this the 5 day
of October 1960


Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.

cc: Honorable J. R. Owen
Attorney at Law
Court House Sq.
Bay Minette, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

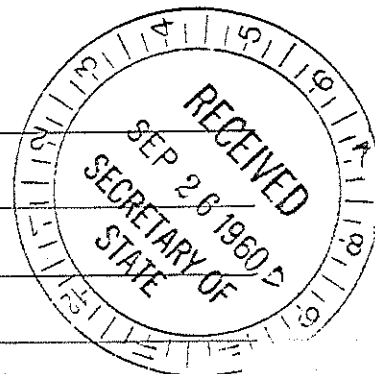
No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon _____

James E. Hines and Fred L. Hines



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 _____

James E. Hines and Fred L. Hines

_____, Defendant_____

by _____

James E. Hines

_____, Plaintiff_____

Witness my hand this _____

day of _____

19____

_____, Clerk

October 5, 1960

JAMES U. WILKINSON, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

FANNIE T. BIMEL, et al, Defendants

CASE NO. 4433

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

I, Bettye Frink, Secretary of State, hereby certify that on September 26, 1960
I sent by registered mail in an envelope addressed as follows:

" Fannie T. Bimel
3107 Country Club Drive
Shreveport, La."

"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:

" Fannie T. Bimel
3107 Country Club Drive
Shreveport, La."

You will take notice that on September 26, 1960 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: JAMES U. WILKINSON, Plaintiff VS FANNIE T. BIMEL, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 4433 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 26
day of September 1960


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 October 3, 1960 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Shreveport, La.
on Sep. 29, 1960

WITNESS MY HAND and the Great Seal of the State of Alabama this the 5 day
of October 1960


Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable J. R. Owen
Attorney at Law
Court House Sq.
Bay Minette, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

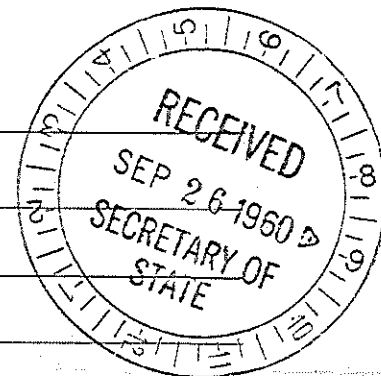
No. 4422

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon -----

Frankie T. Stiel and Fred B. Stiel



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 -----

Frankie T. Stiel and Fred B. Stiel

-----, Defendant-----

by -----

James E. Williamson

-----, Plaintiff-----

Witness my hand this -----

day of -----

19 60

LeRoy F. Newch, Clerk

JAMES U. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COUNT ONE

The Plaintiff claims of the Defendants the sum of TEN THOUSAND DOLLARS (\$10,000.00) for that heretofore on to-wit, April 15, 1960, at a point on U. S. Highway No. 98 in Baldwin County, Alabama, which is a public highway, 1580 feet South of D'olive Creek Bridge, the Defendant, Fannie T. Bimel, who was then and there an agent, servant or employee of the Defendant, Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated an automobile as to cause it to run into, upon or against a Baldwin County School Bus so as to cause the said school bus to go out of control and run into, upon or against the automobile of Plaintiff and as a proximate result of the negligence of the said Defendant, Fannie T. Bimel, at said time and place while acting as an agent, servant or employee of Fred B. Bimel and acting within the line and scope of her authority as such agent, servant or employee, the Plaintiff was injured as follows: He suffered two broken ribs; he suffered a cut on his head and ear; his back and shoulder was bruised and injured; he was put in great pain and made sick, sore and nervous for a long period of time; he was forced to spend large sums of money for doctor bills and for medicine in and about the treatment of his said injuries. Plaintiff avers that all of his injuries were caused as a proximate result of the negligence of the defendant, Fannie T. Bimel while acting as an agent, servant or employee of the Defendant, Fred B. Bimel, and while she was acting within the line and scope of her authority as such agent, servant or employee

at said time and place.

COUNT TWO

The Plaintiff claims of the Defendants the sum of SEVEN

HUNDRED FIFTY DOLLARS (\$750.00) for that heretofore on to-wit,

April 15, 1960, at a point on U. S. Highway No. 98, a public highway in Baldwin County, Alabama, at a point 1580 feet South of D.O. Olive

Creek Bridge, the Defendant, Fannie T. Bimel, who was then and there

an agent, servant or employee of the Defendant, Fred B. Bimel, acting

within the line and scope of her authority as such agent, servant

or employee, so negligently operated an automobile as to cause it

to run into, upon, or against a Baldwin County School Bus causing

the said school bus to go out of control and run into, upon or

against the automobile of the Plaintiff and as a proximate result

of the negligence of the said Defendant, Fannie T. Bimel, who was

then and there an agent, servant or employee of the Defendant, Fred

B. Bimel, acting within the line and scope of her authority as such

agent, servant or employee, the automobile of Plaintiff was damaged

as follows, to-wit: The left front fender was damaged and destroyed;

the left wheel and tire was damaged; the left front door and the

left rear door were destroyed; the frame of Plaintiff's automobile

was bent; the windshield was broken and destroyed and Plaintiff

was put to much trouble and expense in and about the repair of his

said automobile all to his damage as aforesaid. Plaintiff avers

that all of his damages were caused as a proximate result of the

negligence of the Defendant, Fannie T. Bimel, who was then and there

an agent, servant or employee of the Defendant, Fred B. Bimel,

acting within the line and scope of her authority as such agent,

servant or employee.

Plaintiff respectfully demands a

trial by jury of said cause.

Attorney for Plaintiff

FILED

SEP 22 1960

ALICE T. DUCK, CLERK

NITA C. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

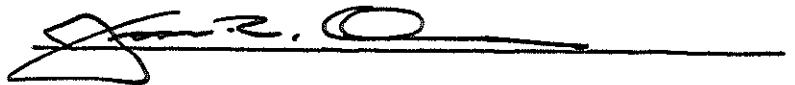
STATE OF ALABAMA)

*

BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared
James R. Owen, who first being duly and legally sworn deposes and
says:

That he is the attorney for the Plaintiff in the above
styled cause; that the Defendants in said cause are non-residents
of the State of Alabama and their address is 3107 Country Club
Drive, Shreveport, Louisiana.



Sworn to and subscribed before me
on this the 22nd day of September, 1960.



Notary Public, Baldwin County, Alabama.

FILED

SEP 22 1960

AUDIE I. DUCK, CLERK
REGISTER

JAMES U. WILKINSON,
Plaintiff,
VS.
FANNIE T. BIMEL and FRED B.
BIMEL,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

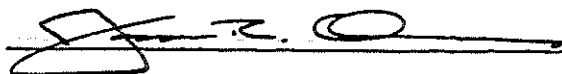
AT LAW

4433

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared
James R. Owen, who first being duly and legally sworn deposes and
says:

That he is the attorney for the Plaintiff in the above
styled cause; that the Defendants in said cause are non-residents
of the State of Alabama and their address is 3107 Country Club
Drive, Shreveport, Louisiana.



Sworn to and subscribed before me
on this the 22nd day of September, 1960.



Notary Public, Baldwin County, Alabama

FILED

SEP 22 1960

ALICE L. DUCK, CLERK
REGISTER

APPEARANCE
STATE OF ALABAMA -- ^{BALDWIN}~~MOBILE~~ COUNTY
CIRCUIT COURT — CIVIL DIVISION

JAMES U. WILKINSON,

Plaintiff,

vs.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

CASE NO. 4433

Bay Minette,
Mobile, Ala., October 24 1960

I appear for

the Defendants

in the above entitled cause and reserve the right to demur or plead specially.

Filed October 25, 1960

W. A. Adams
Attorney for **Defendants**

Deirdre J. Smith
Clerk

216

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4433

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

Fannie T. Bimel and Fred B. Bimel

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

Fannie T. Bimel and Fred B. Bimel

Defendant

by James U. Wilkinson

Plaintiff

Witness my hand this 22 day of September 1960

Chief Clerk, Clerk

No. 4433 Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

JAMES U. WILKINSON

Plaintiffs

vs.

FANNIE T. BIMEL and

FRED B. BIMEL

Defendants

Summons and Complaint

Filed 9-22 19 60

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

RECEIVED IN OFFICE

Defendant 1960

M. S. BUTLER, Sheriff

Received In Office

Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with

Executed by serving 6 copies of
the within on Betty Frank
Secretary of State of The State of
Alabama.

This the 26 day of Sept 19 60

Sheriff of Montgomery County

M. S. Butler,

By Remo D. S.

The Sheriff claims 2
miles at 10c per mile for a total
of \$ 1.20

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

Deputy Sheriff.

JAMES U. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

STATE OF ALABAMA)

*

BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared
James R. Owen, who first being duly and legally sworn deposes and
says:

That he is the attorney for the Plaintiff in the above
styled cause; that the Defendants in said cause are non-residents
of the State of Alabama and their address is 3107 Country Club
Drive, Shreveport, Louisiana.



Sworn to and subscribed before me
on this the 22nd day of September, 1960.



Notary Public, Baldwin County, Alabama

JAMES U. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

4433

COUNT ONE

The Plaintiff claims of the Defendants the sum of TEN THOUSAND DOLLARS (\$10,000.00) for that heretofore on to-wit, April 15, 1960, at a point on U. S. Highway No. 98 in Baldwin County, Alabama, which is a public highway, 1580 feet South of D'olive Creek Bridge, the Defendant, Fannie T. Bimel, who was then and there an agent, servant or employee of the Defendant, Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated an automobile as to cause it to run into, upon or against a Baldwin County School Bus so as to cause the said school bus to go out of control and run into, upon or against the automobile of Plaintiff and as a proximate result of the negligence of the said Defendant, Fannie T. Bimel, at said time and place while acting as an agent, servant or employee of Fred B. Bimel and acting within the line and scope of her authority as such agent, servant or employee, the Plaintiff was injured as follows: He suffered two broken ribs; he suffered a cut on his head and ear; his back and shoulder was bruised and injured; he was put in great pain and made sick, sore and nervous for a long period of time; he was forced to spend large sums of money for doctor bills and for medicine in and about the treatment of his said injuries. Plaintiff avers that all of his injuries were caused as a proximate result of the negligence of the defendant, Fannie T. Bimel while acting as an agent, servant or employee of the Defendant, Fred B. Bimel, and while she was acting within the line and scope of her authority as such agent, servant or employee

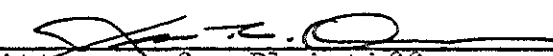
at said time and place.

COUNT TWO

The Plaintiff claims of the Defendants the sum of SEVEN HUNDRED FIFTY DOLLARS (\$750.00) for that heretofore on to-wit, April 15, 1960, at a point on U. S. Highway No. 98, a public highway in Baldwin County, Alabama, at a point 1580 feet South of D'olive Creek Bridge, the Defendant, Fannie T. Bimel, who was then and there an agent, servant or employee of the Defendant, Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated an automobile as to cause it to run into, upon, or against a Baldwin County School Bus causing the said school bus to go out of control and run into, upon or against the automobile of the Plaintiff and as a proximate result of the negligence of the said Defendant, Fannie T. Bimel, who was then and there an agent, servant or employee of the Defendant, Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee, the automobile of Plaintiff was damaged as follows, to-wit: The left front fender was damaged and destroyed; the left wheel and tire was damaged; the left front door and the left rear door were destroyed; the frame of Plaintiff's automobile was bent; the windshield was broken and destroyed and Plaintiff was put to much trouble and expense in and about the repair of his said automobile all to his damage as aforesaid. Plaintiff avers that all of his damages were caused as a proximate result of the negligence of the Defendant, Fannie T. Bimel, who was then and there an agent, servant or employee of the Defendant, Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee.


Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury of said cause.


Attorney for Plaintiff

FILED

SEP 22 1960

ALICE L. DUCK, CLERK
REGISTER

COMPLAINT

JAMES U. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

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

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

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

October 24, 1960

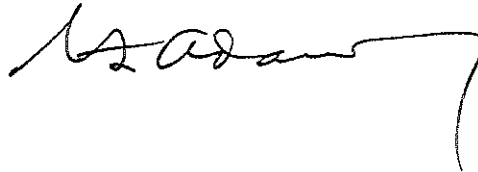
Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Cases No. 4433 and 4434
Wilkinson vs. Bimel

Dear Mrs. Duck:

I shall appreciate it if you will file the enclosed
appearances in the two suits of Wilkinson vs. Bimel.

Very truly yours,



RFA/an
Encls.

cc: Mr. James R. Owen
Bay Minette, Alabama