

October 5, 1960

NITA C. WILKINSON, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

FANNIE T. BIMEL, et al, Defendants

CASE NO. 4434

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: NITA C. WILKINSON, Plaintiff VS FANNIE T. BIMEL, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 4434 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 ADDRESS NOT GIVEN
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
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

NITA C. 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, 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 so as to cause the said school bus to go out of control and run into, upon or against the automobile in which the Plaintiff was riding and as a proximate consequence 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 said Plaintiff was injured as follows to-wit: Her nose was fractured and made sore and bruised; two of her ribs were broken; she suffered two black eyes; she suffered and continues to suffer from nervousness and she suffers from headaches continuously and has been put to much trouble and expense in and about the treatment of her injuries. Plaintiff avers that all of her injuries were caused as a proximate result of the negligence of the Defendant, Fannie T. Bimel, the agent, servant or employee of Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee at said time and place all to her damage and injuries aforesaid, hence this suit.

FILED

22 1960

ALICE J. DUCK, CLERK
REGISTER

 Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

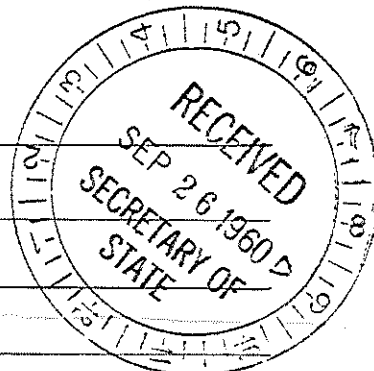
No. ~~1423~~-----

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

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon -----

~~Fannie B. Bland and Fred B. Bland~~



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 B. Bland and Fred B. Bland~~

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

by -----

~~Wm. C. Williamson~~

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

Witness my hand this -----

day of -----

19-----

Alice J. Duck Clerk

No. _____ Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19____

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.

Plaintiff demands a trial by jury of
said cause.

~~Attorney for Plaintiff~~

NITA C. WILKINSON, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

FRED B. BIMEL, et al, Defendants

CASE NO. 4434

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: NITA C. WILKINSON, Plaintiff VS FRED B. BIMEL, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 4434 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

NITA C. 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, 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 so as to cause the said school bus to go out of control and run into, upon or against the automobile of the Plaintiff, Nita C. Wilkinson, riding and as a proximate consequence 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 said Plaintiff was injured as follows to-wit: Her nose was fractured and made sore and bruised; two of her ribs were broken; she suffered two black eyes; she suffered and continues to suffer from nervousness and she suffers from headaches continuously and has been put to much trouble and expense in and about the treatment of her injuries. Plaintiff avers that all of her injuries were caused as a proximate result of the negligence of the Defendant, Fannie T. Bimel, the agent, servant or employee of Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee at said time and place all to her damage and injuries aforesaid, hence this suit.

FILED

1960

AUG 1 DUCK

CLERK
REGISTER


Attorney for Plaintiff

Plaintiff demands a trial by jury of
said cause.

J. R. O.
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

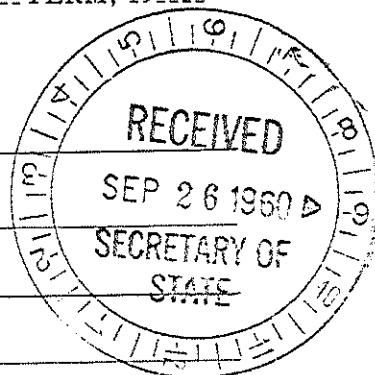
No. 1434

TERM, 19__

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

Fannie F. Binal and Fred B. Binal



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 F. Binal and Fred B. Binal

Defendant

by W. C. Wilkinson

Plaintiff

Witness my hand this 22 day of September 1960

Alice J. Duck

Clerk

No. _____ Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19____

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.

NITA C. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

700,4434

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, 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 so as to cause the said school bus to go out of control and run into, upon or against the automobile in which the Plaintiff was riding and as a proximate consequence 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 said Plaintiff was injured as follows to-wit: Her nose was fractured and made sore and bruised; two of her ribs were broken; she suffered two black eyes; she suffered and continues to suffer from nervousness and she suffers from headaches continuously and has been put to much trouble and expense in and about the treatment of her injuries. Plaintiff avers that all of her injuries were caused as a proximate result of the negligence of the Defendant, Fannie T. Bimel, the agent, servant or employee of Fred B. Bimel, acting within the line and scope of her authority as such agent, servant or employee at said time and place all to her damage and injuries aforesaid, hence this suit.

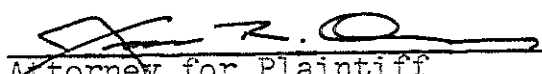
FILED

SEP 22 1960

AUDIE L. DUCK, CLERK
REGISTER


Attorney for Plaintiff

Plaintiff demands a trial by jury of
said cause.


Attorney for Plaintiff

C O M P L A I N T

NITA C. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4434

----- 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 Nita C. Wilkinson -----

-----, Plaintiff.

Witness my hand this 22 day of September 19 60

Alvin J. Ruck, Clerk

No. 1434 Page _____

STATE of ALABAMA
Baldwin County
CIRCUIT COURT

NITA C. WILKINSON

Plaintiffs

VS.

FANNIE T. BIMEL and FRED B. BIMEL

Defendants

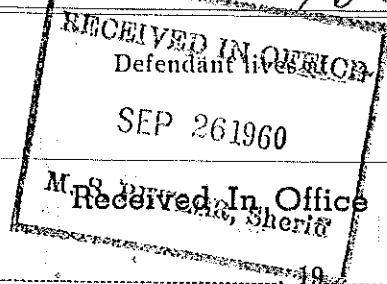
Summons and Complaint

Filed 9-22 1960

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney



Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with

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

This the 26 day of Sept 1960

Sheriff of Montgomery County

M. S. Butler,

By Robert 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.

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

NITA C. WILKINSON,

Plaintiff,

vs.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants

CASE NO. 4434

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. L. Adams
Attorney for Defendants

Deirdre J. Henry
Clerk

NITA C. WILKINSON,

Plaintiff,

VS.

FANNIE T. BIMEL and FRED B.
BIMEL,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

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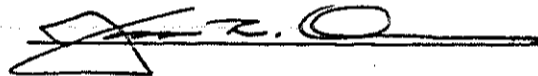
STATE OF ALABAMA)

*

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.

Mary Lou Blackburn

Notary Public, Baldwin County, Alabama.

FILED

SEP 22 1960

ALICE J. DUCK, CLERK
REGISTER