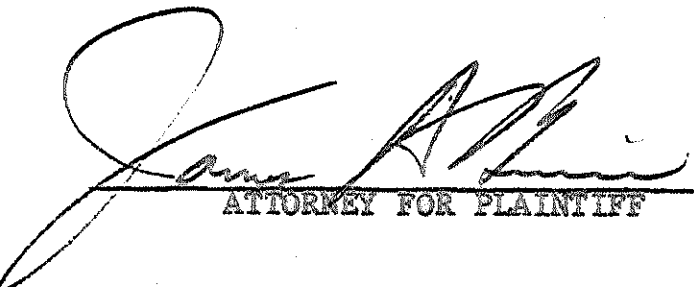


CHARLES R. SPORCK,)	IN THE CIRCUIT COURT OF
)	
PLAINTIFF,)	BALDWIN COUNTY, ALABAMA
)	
VS.)	AT LAW.
)	
ANDREW DEES and WALLACE)	
TAXICAB COMPANY,)	
)	
DEFENDANTS.)	

4230

C O M P L A I N T

Plaintiff claims of the defendants the sum of Two Thousand and No/100 (\$2,000.00) Dollars, as damages, for that heretofore, on, to-wit: the 22nd day of June, 1959, the defendant, Andrew Dees, so negligently operated a motor vehicle owned by the defendant, Wallace Taxicab Company, Westwardly on U. S. Highway 90 at a point one (1) mile East from the corporate limits of Robertsedale, Baldwin County, Alabama, so as to cause or allow said vehicle to collide with a motor vehicle being operated by the Plaintiff in the same direction on said highway where Plaintiff had a lawful right to be, and as a direct and proximate result of the negligence of the defendant, Andrew Dees, the Plaintiff was caused to suffer personal injuries, was made sick and sore, and Plaintiff's motor vehicle was greatly damaged, for all of which Plaintiff was caused to incur expenses in the treatment of his injuries, and in the repair of his motor vehicle, for all of which Plaintiff claims damages as afore-said.


 ATTORNEY FOR PLAINTIFF

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

ANDREW DEES and WALLACE TAXICAB COMPANY

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 **ANDREW DEES and**
WALLACE TAXICAB COMPANY, Defendant-----

by **CHARLES R. SPORCK**

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

Witness my hand this

8

day of

Apr

1960

Archie J. Leuch, Clerk

No. 4230

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

CHARLES R. SPORCK

Plaintiffs

vs.

ANDREW DEES and WALLACE

TAXICAB COMPANY

Defendants

Summons and Complaint

Filed

FILED

19__

APR 8 1961

Clerk

**ALICE J. DUCK, CLERK
REGISTER**

JAMES A. BRICE

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.

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

April 6, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

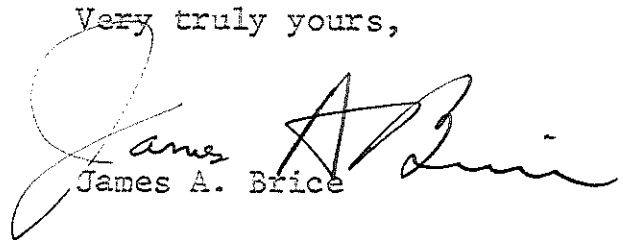
Re: Charles R. Sporck
vs: Andrew Dees and Wallace
Taxicab Company

Dear Mrs. Duck:

I am enclosing initial pleadings on behalf of Plaintiff in the above styled action. Wallace Taxicab Company does business in Robertsdale, Baldwin County, Alabama, and the defendant, Andrew Dees, may be served at his residence at Route 1, Evergreen, Alabama.

Thank you.

Very truly yours,


James A. Brice

JAB/vd

Enclosures

cc:Mr. Frank B. Boatwright, Jr.
Loss Department
South Carolina Insurance Company
Columbia, South Carolina

E. G. RICKARBY

392 FAIRHOPE AVENUE

FAIRHOPE, ALABAMA

July 19, 1960

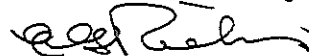
Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Charles R. Sporck
Vs: Andrew Dees & C. E.
Wallace, Individually
and d/b/a Wallace Taxi-
cab Co.

Enclosed find Plea in the above mentioned cause, case #4230.
Please file and oblige. Copy of this Plea has been sent to
James A. Bryce, Esquire, Attorney for Plaintiff. I am also
filing motion for security for costs.

Yours very truly,



EGR/wr

Encs:

cc: Mr. Bryce

cc: Mr. Parker

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

April 26, 1960

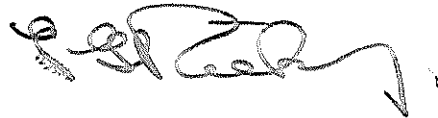
Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck;

Re: Charles R. Sporck
Vs: Andrew Dees and Wallace
Taxicab Company
Your File: 4230

With this we are handing you Demurrers in
the above mentioned matter.

Yours very truly,



EGR/bs
cc: Brice
cc: Parker

CHARLES R. SPORCK,
PLAINTIFF,

VS.

ANDREW DEES and WALLACE
TAXICAB COMPANY,

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

AMENDMENT

Comes the plaintiff and amends the complaint heretofore
filed in this cause of action so that same shall read as follows:

CHARLES R. SPORCK

PLAINTIFF,

VS.

ANDREW DEES and C. E.
WALLACE, individually
and d/b/a WALLACE TAXICAB
COMPANY

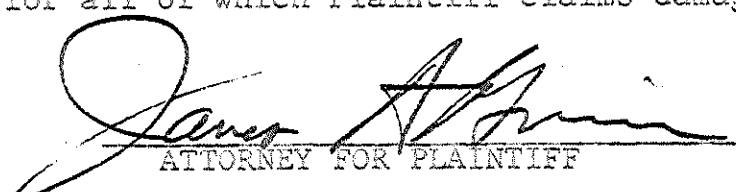
DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW, NO. 4230

COMPLAINT

Plaintiff claims of the defendants the sum of Two Thousand
and No/100 (\$2,000.00) Dollars as damages, for that heretofore on,
to wit, the 22nd day of June, 1959, the defendant, Andrew Dees,
while acting within the line and scope of his employment as agent,
servant or employee of the defendant C. E. Wallace, individually
and d/b/a Wallace Taxicab Company, so negligently operated a motor
vehicle owned by the defendant, C. E. Wallace, Westwardly on U.S.
Highway 90 at a point one (1) mile East from the corporate limits
of Robertsedale, Baldwin County, Alabama, so as to cause or allow
said vehicle to collide with a motor vehicle owned being operated
by the plaintiff in the same direction on said highway where
plaintiff had a lawful right to be, and as a direct and proximate
result of the negligence of the defendant, Andrew Dees, the Plaintiff
was caused to suffer personal injuries, i.e. cuts and bruises of
the head and body, was made sick and sore, and Plaintiff's motor
vehicle was greatly damaged, for all of which Plaintiff was caused
to incur expenses in the treatment of his injuries, and in the re-
pair of his motor vehicle, for all of which Plaintiff claims damages
as aforesaid.


ATTORNEY FOR PLAINTIFF

FILED

JUN 21 1960

ALICE I. DUCK, CLERK
REGISTER

CHARLES R. SPORCK

Plaintiff

VS

ANDREW DEES and C. E.
WALLACE, individually
and d/b/a WALLACE TAXICAB
COMPANY

Defendants

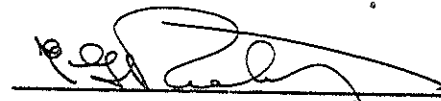
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

Case #4230

MOTION FOR SECURITY OF COSTS

Comes the Defendant in the above styled court and shows to this court that the Plaintiff in this case is a non-resident of the State of Alabama and that no deposit for costs has been made in this case, wherefore, the Plaintiff moves that the Defendant be required to make proper deposit for costs in this cause or that the cause be dismissed for his failure to make said deposit or for such other special relief as is right and proper.



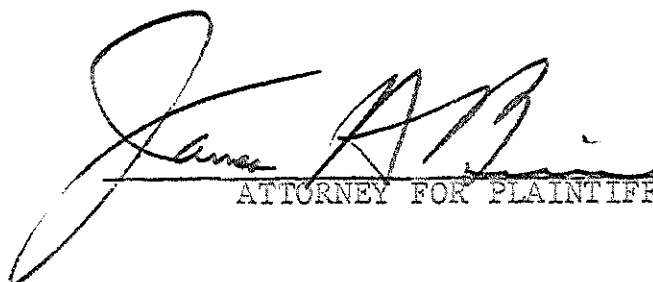
Attorney for the Defendant

CHARLES R. SPORCK,)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
PLAINTIFF,)	
VS.)	AT LAW.
ANDREW DEES and WALLACE)	
TAXICAB COMPANY,)	
DEFENDANTS.)	

C O M P L A I N T

Plaintiff claims of the defendants the sum of Two Thousand and No/100 (\$2,000.00) Dollars, as damages, for that heretofore, on, to-wit: the 22nd day of June, 1959, the defendant, Andrew Dees, so negligently operated a motor vehicle owned by the defendant, Wallace Taxicab Company, Westwardly on U. S. Highway 90 at a point one (1) mile East from the corporate limits of Robertsedale, Baldwin County, Alabama, so as to cause or allow said vehicle to collide with a motor vehicle being operated by the Plaintiff in the same direction on said highway where Plaintiff had a lawful right to be, and as a direct and proximate result of the negligence of the defendant, Andrew Dees, the Plaintiff was caused to suffer personal injuries, was made sick and sore, and Plaintiff's motor vehicle was greatly damaged, for all of which Plaintiff was caused to incur expenses in the treatment of his injuries, and in the repair of his motor vehicle, for all of which Plaintiff claims damages as aforesaid.

FILED
APR 8 1961
HIDE L. DICK, 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.-----

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

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon ANDREW DEES and WALLACE TAXICAB COMPANY

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 ANDREW DEES and
WALLACE TAXICAB COMPANY-----, Defendant-----

by CHARLES R. SPORCK-----

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

Witness my hand this-----

8

day of

1960

-----, Clerk

Ex-4-12-60

No. 4230

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

CHARLES R. SPORCK

Plaintiffs

vs.

ANDREW DEES and WALLACE

TAXICAB COMPANY

Defendants

Summons and Complaint

FILED

Filed

APR 8 1960

19

ALICE A. DUCK, CLERK
REGISTER

Clerk

JAMES A. BRICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

4/8, 1960

Sheriff.

I have executed this summons

this 4-12 1960
by leaving a copy with

Clarence Wallace
d/b/a Wallace
Express Co.

Returned 12 day of April 1960
Not found in my county after diligent search and in
quiry. Andrew Dees

Taylor Wilkins, Sheriff

By

Stedham
Deputy Sheriff

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY

68
DEPUTY SHERIFF

Taylor Wilkins
Sheriff.

Edleigh Stedham
Deputy Sheriff.

Robertsdale, Ala.

CHARLES R. SPORCK

Plaintiff

VS

ANDREW DEES and C. E.
WALLACE, individually
and d/b/a WALLACE TAXICAB
COMPANY

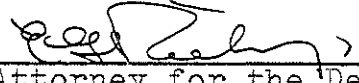
Defendants

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

P L E A

Comes the Defendants in the above styled cause and
offers the following plea to the Plaintiff's complaint in
each and every count thereof:

1. Not guilty.



Attorney for the Defendant

Filed
7-20-60

CHARLES R. SPORCK,

Plaintiff,

-VS-

ANDREW DEES and WALLACE
TAXICAB COMPANY,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

DEMURRERS

Comes C. E. WALLACE, one of the parties upon whom the summons and complaint was served in this cause, and offers the following separate and several demurrers to said complaint and assigns as grounds for said demurrers the following:

1. That said summons and complaint does not show what the WALLACE TAXICAB COMPANY is;
2. That said summons and complaint does not show whether the WALLACE TAXICAB COMPANY is a corporation, a natural person, a partnership or an association;
3. That summons and complaint does not name C. E. WALLACE as a party defendant;
4. That said complaint does not charge the defendant, WALLACE TAXICAB COMPANY, with negligence;
5. That said complaint does not show how CHARLES R. SPORCK, the plaintiff, was injured;
6. That said complaint does not show the location of, or to what extent the motor vehicle of the plaintiff was damaged;
7. That said complaint does not show that the motor vehicle damaged in said accident was the property of the plaintiff.


Attorney for C. E. WALLACE

Filed
4-29-60