

COLLINS, GALLOWAY & MURPHY

ATTORNEYS AT LAW

817 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

HEMLOCK 2-0568

March 13th, 1961

FRED G. COLLINS

THOMAS M. GALLOWAY

M. THOMAS MURPHY (1925-1956)

4638

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

Re: Exer C. Lord
vs: Charles H. Jones and
Arthur Pettibone


Dear Mrs. Duck:

Enclosed please find an original and two copies
of a Complaint. Would you please have the same filed in
your Court and summons issued to the Defendants?

Sincerely yours,

COLLINS, GALLOWAY & MURPHY

BY:


FRED G. COLLINS

FGC/tb
Enclosures

EXER C. LORD,
Plaintiff

VS.

CHARLES H. JONES and
ARTHUR PETTIBONE, jointly
and severally,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

CIVIL DIVISION

NO. 4632

COUNT I

The Plaintiff claims of the Defendants, separately and severally, the sum of FIVE HUNDRED AND NO/100 (\$500.00) DOLLARS, as damages for that heretofore and on to-wit: October 21st, 1960, the Plaintiff's automobile was being operated upon and along U.S. Highway 59, at or near its intersection with Berry Street, both said highway and street being then and there a public highway and street in the County of Baldwin, Alabama, and at said time and place, the Defendant, Charles H. Jones, being then and there an agent, servant or employee of the Defendant, Arthur Pettibone, acting within the line and scope of his employment as such, so negligently operated a motor vehicle so as to cause or allow the same to collide with the motor vehicle of the Plaintiff, and as a proximate result and consequence of the aforesaid negligence, of the Defendant, the Plaintiff's automobile was greatly mashed, bent and broken, all to his great damage in the amount aforesaid, hence this suit.

COLLINS, GALLOWAY & MURPHY

BY: 

Fred G. Collins

ATTORNEYS FOR THE PLAINTIFF

Defendant's addresses:

Charles H. Jones
c/o The Foley Plumbing & Heating Co. Foley, Alabama
Foley, Alabama
Arthur Pettibone
Foley, Alabama

FILED

MAR 15 1961

ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon _____

Charles H. Jones and Arthur Pettibone

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 _____

Charles H. Jones and Arthur Pettibone

_____, Defendant_____

by Exer C. Lord

_____, Plaintiff_____

Witness my hand this 15th day of March 19 61

Alvin J. Duck, Clerk

No. 4632 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

EXER C. LORD

Plaintiffs

vs.

CHARLES H. JONES and

ARTHUR PETTIBONE

Defendants

SUMMONS and COMPLAINT

Filed 3-15, 19 61

Alice J. Duck

, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

3/15, 1961

, Sheriff

I have executed this summons

this Mar 20, 1961

by leaving a copy with

Charles H. Jones
Arthur Pettibone

Sheriff claims 14.4 miles at

Ten Cents per mile Total \$ 1.44

JAYLOR WILKINS, Sheriff

BY Childress
DEPUTY SHERIFF

Jaylor Wilkins Sheriff

Childress Deputy Sheriff

Duck