

ARMBRECHT, JACKSON, McCONNELL & DeMOUY

LAWYERS

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

June 7, 1961

WM. H. ARMBRECHT
THEO. K. JACKSON
JOHN W. McCONNELL, JR.
MARSHALL J. DeMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOK G. HOLMES
W. BOYD REEVES

MAILING ADDRESS
P. O. BOX 290
MOBILE, ALA.

CABLE ADDRESS
SEALAW

TELEPHONE
HEMLOCK 3-1891

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

Re: Mrs. Mable Marie Ragan, Plaintiff,
vs. Gasper Lazzara, Defendant.
No. 4694

Dear Mrs. Duck:

Enclosed you will find a copy of the Petition for Removal, together with a copy of the Removal Bond and Notice of Removal, which we have filed in the United States District Court of the Southern District of Alabama in the captioned matter. Please file these papers in the captioned case.

Very truly yours,

ARMBRECHT, JACKSON, McCONNELL
& DeMOUY

By Brook G. Holmes
Brook G. Holmes

BGH
ah
Enclosures

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE
SOUTHERN DISTRICT OF ALABAMA - SOUTHERN DIVISION

MRS. MABLE MARIE RAGAN,)
Plaintiff, (PETITION FOR REMOVAL
VS.)
GASPER LAZZARA, ()
Defendant.) CIVIL ACTION NO.

Appearing specially for the purpose of filing this Petition and without submitting to the jurisdiction of this Court to take any action other than action upon this Petition, comes now GASPER LAZZARA, the correct name of the Defendant in the above styled cause, and presents and files this, his Petition for Removal of the above entitled cause from the Circuit Court of Baldwin County, Alabama, in which the same now pends, to the District Court of the United States for the Southern District of Alabama, Southern Division thereof, held in the City of Mobile, Alabama, and respectfully shows in support thereof the following:

1. That your Petitioner, Gasper Lazzara, is the Defendant in a civil action brought against him in the Circuit Court of Baldwin County, Alabama, entitled "Mrs. Mable Marie Ragan, Plaintiff, vs. Gasper Lazzara, Defendant". A copy of the Summons and Complaint and letter of notice from the Secretary of State of the State of Alabama served on Petitioner are attached hereto and constitute all process, pleadings, and orders served upon Petitioner in such action.

FILED
JUN 8 1961
ALICE L. DUCK, CLERK
REGISTER

2. That the aforesaid action was commenced by service of process, consisting of said Summons and Complaint upon the Secretary of State of the State of Alabama on May 17, 1961 and thereafter by registered mail upon the Defendant at Post Office Box 11117, Tampa 10, Florida.

3. Petitioner further shows that said suit is one of a civil nature and is a suit for the recovery of \$75,000.00 allegedly due said Mable Marie Ragan as a result of alleged injuries received by the said Plaintiff on the 7th day of February, 1961, as a result of an accident which occurred at 4.3 miles east of Mobile, Alabama on U.S. Highway 90.

4. The Plaintiff, Mable Marie Ragan, at the time this action was commenced was, and still is, a citizen of the State of Alabama, and the Defendant, Gasper Lazzara, at the time this action was commenced was, and still is a citizen of the State of Florida, and was not and is not a citizen of the State of Alabama wherein this action was brought. The amount in controversy in said suit, exclusive of interest and costs, exceeds the sum of \$10,000.00.

5. Petitioner files herewith a good and sufficient bond such as required by law, conditioned that the Petitioner will pay all costs which may be awarded by this Court if this Court shall determine that this suit was not removable or was wrongfully or improperly removed hereto.

WHEREFORE, your Petitioner prays that this cause proceed in this Court as an action properly removed thereto.

GASPER LAZZARA

By Broox G. Holmes
Broox G. Holmes
As his Attorney In Fact

OF COUNSEL:

ARMBRECHT, JACKSON, McCONNELL & DeMOUY
1101 Merchants National Bank Building
Mobile, Alabama

AFFIDAVIT

Personally appeared before me, the undersigned authority, BROOX G. HOLMES, who is known to me, and who, being by me first duly sworn, deposes and says that he is one of the attorneys of record for Gasper Lazzara; that he is authorized to make this affidavit for and on his behalf; that he is familiar with the allegations of the foregoing Petition and is informed and believes that the allegations of the same are true and correct, and upon such information and belief says that the allegations of said Petition are true and correct.

Broox G. Holmes
Broox G. Holmes

SUBSCRIBED and SWORN to before me

this 7th day of June, 1961.

Annette Hurst
Notary Public, Mobile County, Alabama

My Commission Expires: February 4, 1964

(AFFIX NOTARIAL SEAL)

I, BROOX G. HOLMES, hereby certify that Notice of the foregoing Petition for Removal, together with a copy of the foregoing Petition and Bond for Removal, was served on Messrs. Horne, Webb & Tucker, Attorneys for the Plaintiff Mable Marie Ragan, by depositing same in the United States Mail, postage prepaid, and certified, addressed to them at their offices in Atmore, Alabama on this the 7th day of June, 1961.

Broox G. Holmes
Broox G. Holmes

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE
SOUTHERN DISTRICT OF ALABAMA - SOUTHERN DIVISION

MRS. MABLE MARIE RAGAN,) REMOVAL
Plaintiff, (BOND

VS.)

GASPER LAZZARA, (

Defendant.) CIVIL ACTION NO.

KNOW ALL MEN BY THESE PRESENTS, that we, GASPER LAZZARA, as Principal, and MASSACHUSETTS BONDING & INSURANCE COMPANY, as Surety, are held and firmly bound unto MRS. MABLE MARIE RAGAN, Plaintiff in the above entitled cause, in the sum of FIVE HUNDRED AND NO/100 DOLLARS (\$500.00) for the payment of which, well and truly to be made, we and each of us do bind ourselves, our successors and assigns, jointly, severally and firmly by these presents.

Dated this 7th day of June, 1961.

The condition of this obligation is such that whereas, Gasper Lazzara, the principal obligator has applied to the District Court of the United States for the Southern District of Alabama, Southern Division thereof, to remove the cause pending in the Circuit Court of Baldwin County, Alabama, wherein the said Mable Marie Ragan is the Plaintiff and Gasper Lazzara is Defendant, to the District Court of the United States for the Southern District of Alabama, sitting in the Southern Division in the City of Mobile, Alabama, and that all further action in the said Court aforesaid be stayed.

NOW, THEREFORE, if the Petitioner, the undersigned Gasper Lazzara, shall pay all costs that may be awarded by the United States District Court if the said District Court shall hold that such suit was not removable or was wrongfully removed thereto, then this obligation shall be void; otherwise to be and remain in full force and effect.

GASPER LAZZARA

By Brent G. Holmes
As his Attorney In Fact
PRINCIPAL

MASSACHUSETTS BONDING & INSURANCE
COMPANY

By [Signature]
As its Attorney In Fact
SURETY



| | | |
|-------------------------|---|----------------------|
| MRS. MABLE MARIE RAGAN, |) | IN THE CIRCUIT COURT |
| Plaintiff, | (| OF BALDWIN COUNTY, |
| |) | ALABAMA |
| VS. | (| AT LAW |
| GASPER LAZZARA, |) | NOTICE OF REMOVAL |
| Defendant. | (| NO. 4694 |

TO: Messrs. Horne, Webb & Tucker
Attorneys at Law
Atmore, Alabama

Please take notice that the Defendant, Gasper Lazzara, in the above entitled action, has on the 7th day of June, 1961, filed his Petition and Bond for Removal, copies of which are attached hereto, in the Office of the Clerk of the United States District Court for the Southern District of Alabama, Southern Division.

This notice is given you in accordance with the provisions of Title 28, Section 1456(e), U.S.C.A.

ARMBRECHT, JACKSON, McCONNELL
& DeMOUY

By Bruce S. Holmes
Attorney for Defendant,
Gasper Lazzara

C I R C U I T C O U R T

STATE OF ALABAMA X
BALDWIN COUNTY X

TO: ANY SHERIFF OF THE STATE OF ALABAMA.
GREETINGS:

You are hereby commanded to summons Gasper Lazzara to appear within thrity (30) days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held for said county at the place of holding same, then and there to answer, plead or demur to the complaint of Mrs. Mable Marie Ragan.

Witness my hand, this 3 day of May, 1961.

Alfred J. Ruck
CLERK.

* * * * *
C O M P L A I N T

| | | |
|-------------------------|---|--------------------------|
| MRS. MABLE MARIE RAGAN, | X | IN THE CIRCUIT COURT OF |
| PLAINTIFF. | X | BALDWIN COUNTY, ALABAMA. |
| VS. | X | AT LAW. |
| GASPER LAZZARA, | X | NUMBER: <u>4694</u> . |
| DEFENDANT. | X | |

COUNT ONE.

The plaintiff claims of the defendant the sum of Seventy-five Thousand and No/100 (\$75,000.00) Dollars, as damages for that on, to-wit; the 7th day of February, 1961, while plaintiff was riding as a passenger in an automobile over which plaintiff had no charge, direction or control on a public highway, to-wit; U. S. #90 at a point on said public highway approximately 4.3 miles East of Mobile, Alabama, in Baldwin County, Alabama, Eugene Morris the agent, servant or employee of defendant while acting within the line and scope of his employment with defendant so negligently operated a truck of defendant as to cause said truck to run over, upon or against the automobile in which plaintiff was then and there riding as a passenger and as a proximate consequence of the negligence of the said Eugene Morris the agent, servant or employee of defendant the plaintiff was severely and permanently injured in this, to-wit:

Plaintiff was caused to sustain and did sustain a Cerebral concussion; Plaintiff suffered multiple lacerations of the face requiring over two hundred stitches to close; Plaintiff suffered severe shock due to hemmorage from facial lacerations and multiple contusions and abrasions; plaintiff's right ankle was fractured; plaintiff was permanently disfigured; plaintiff was internally injured and permanently injured; plaintiff's nervous system was greatly shocked and impaired and permanently shocked and impaired; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was caused to suffer great physical pain and mental anguish and was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries; plaintiff was caused to incur large doctor, hospital and medical bills in the treatment of her said wounds; plaintiff was made sick, sore and lame for a long period of time; and plaintiff avers that her said injuries were proximately caused by reason and as a proximate consequence of the negligence of the agent, servant or employee of defendant while acting within the line and scope of his employment with the defendant, in this, that said agent, servant or employee so negligently operated the truck of defendant on the occasion complained of as to cause said truck to run over, upon or against the automobile in which plaintiff was then and there riding as a passenger and as a proximate consequence injured plaintiff as aforesaid.

COUNT TWO.

The plaintiff claims of the defendant the sum of Seventy-five Thousand and No/100 (\$75,000.00) Dollars, as damages for that on, to-wit; the 7th day of February, 1961, while plaintiff was riding as a passenger in an automobile over which plaintiff had no charge, direction or control on a public highway, to-wit; U. S. #90 at a point on said public highway approximately 4.3 miles East of Mobile, Alabama, in Baldwin County, Alabama, Eugene Morris, the agent, servant or employee of defendant while acting within the line and scope of his employment with defendant negligently drove a truck of defendant across the said public highway causing the automobile in which plaintiff was then and there riding as a passenger to collide with the truck of defendant and as a proximate result of said negligence of the agent, servant or employee of defendant while acting within the line and scope of his employment with defendant the plaintiff was severely and permanently injured in this, to-wit:

Plaintiff was caused to sustain and did sustain a cerebral concussion; plaintiff suffered multiple lacerations of the face requiring over two hundred stiches to close; plaintiff suffered severe shock due to hemmorage from facial lacerations and multiple contusions and abrasions; plaintiff's right ankle was fractured; plaintiff was permanently disfigured; plaintiff's nervous system was greatly shocked and

impaired and permanently shocked and impaired; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was caused to suffer great physical pain and mental anguish and was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries; plaintiff was caused to incur large doctor, hospital and medical bills in the treatment of her said wounds; plaintiff was made sick, sore and lame for a long period of time hence this suit.

COUNT THREE.

The plaintiff claims of the defendant the sum of Seventy-five Thousand and No/100 (\$75,000.00) Dollars, as damages for that on, to-wit; the 7th day of February, 1961, while plaintiff was riding as a passenger in an automobile over which plaintiff had no charge, direction or control on a public highway, to-wit; U. S. #90 at a point on said public highway approximately 4.3 miles East of Mobile, Alabama, in Baldwin County, Alabama, Eugene Morris the agent, servant or employee of defendant while acting within the line and scope of his employment with defendant negligently obstructed said public highway in foggy weather by placing a truck of defendant across the same; that when said highway was so obstructed and blocked the automobile in which plaintiff was then and there riding as a passenger ran against the truck of defendant so blocking said highway and plaintiff was severely and permanently injured in this, to-wit:

Plaintiff was caused to sustain and did sustain a cerebral concussion; plaintiff suffered multiple lacerations of the face requiring over two hundred stitches to close; plaintiff suffered severe shock due to hemorrhage from facial lacerations and multiple contusions and abrasions; plaintiff's right ankle was fractured; plaintiff was permanently disfigured; plaintiff's nervous system was greatly shocked and impaired and permanently shocked and impaired; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was caused to suffer great physical pain and mental anguish and was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries; plaintiff was caused to incur large doctor, hospital and medical bills in the treatment of her said wounds; plaintiff was made sick, sore and lame for a long period of time hence this suit.

Plaintiff avers that her said injuries were proximately caused by reason and as a proximate consequence of the negligence of the said agent, servant or employee of the defendant while acting within the line and scope of his employment with defendant, in this, that said

agent, servant or employee negligently obstructed or blocked the said public highway at the time and place set out herein hence this suit.

COURT FOUR.

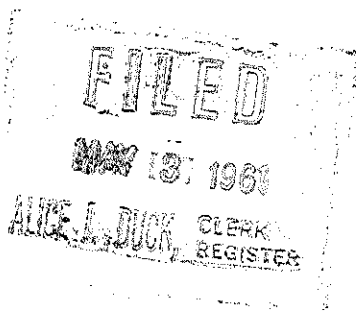
The plaintiff claims of the defendant the sum of Seventy-five Thousand and No/100 (\$75,000.00) Dollars, as damages for that, on to-wit; the 7th day of February, 1961, while plaintiff was riding as a passenger in an automobile over which plaintiff had no charge, direction or control on a public highway, to-wit; U. S. #90 at a point on said public highway approximately 4.3 miles East of Mobile, Alabama, in Baldwin County, Alabama, Eugene Morris, the agent, servant, or employee of defendant while acting within the line and scope of his employment with defendant wilfully and wantonly ran a truck of defendant over, upon or against the automobile in which plaintiff was then and there riding as a passenger and as a proximate consequence of the wilful and wanton conduct of the said Eugene Morris the agent, servant or employee of defendant the plaintiff was wantonly injured in this, to-wit:

Plaintiff was caused to sustain and did sustain a cerebral concussion; plaintiff suffered multiple lacerations of the face requiring over two hundred stitches to close; plaintiff suffered severe shock due to hemmorage from facial lacerations and multiple contusions and abrasions; plaintiff's right ankle was fractured; plaintiff was permanently disfigured; plaintiff's nervous system was greatly shocked and impaired and permanently shocked and impaired; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was caused to suffer great physical pain and mental anguish and was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries; plaintiff was caused to incur large doctor, hospital and medical bills in the treatment of her said wounds; plaintiff was made sick, sore and lame for a long period of time hence this suit.

HORNE, WEBB & TUCKER
BY:


ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved in this cause.



HORNE, WEBB & TUCKER
BY:


ATTORNEYS FOR PLAINTIFF.

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456

RECEIVED IN OFFICE
MAY 5 1961
M. S. BUTLER, Sheriff

Executed by serving 3 copies of
the within on Betty Frank
Secretary of State of The State of
Alabama.

This the 17 day of May 1961

Sheriff of Montgomery County
M. S. Butler,

By Reemo D. S.

The Sheriff claims 2
miles at \$50 per mile for a total
of \$100
M. S. Butler, Sheriff
Montgomery County, Ala.

4694

Mrs. Mable Marie Regan

VS.

Gasper Lazzara

address: Gasper Lazzara
P.O. Box 11117
Dampier, Ala

Law Offices of
Horne, Webb & Tucker
Attorneys at Law
Atmore, Alabama

June 6, 1961

MRS. MABLE MARIE RAGAN, Plaintiff
 VS
 GASPER LAZZARA, Defendant

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

CASE NO. 4694

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

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

May 17, 1961

" Gasper Lazzara
 P. O. Box 11117
 Tampa 10, Florida"

"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:

" Gasper Lazzara
 P. O. Box 11117
 Tampa 10, Florida

You will take notice that on May 17, 1961 the Sheriff of Montgomery
 County, Alabama, served upon me, in my official capacity, summons and complaint in a
 case entitled: MRS. MABLE MARIE RAGAN, Plaintiff VS GASPER LAZZARA, Defendant

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. AT LAW
 Case No. 4694 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 17
 day of May 1961

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 May 24 1961 I received the return card, showing
 receipt by the designated addressee of the aforementioned matter at Tampa Fla.
 on 5-22

WITNESS MY HAND and the Great Seal of the State of Alabama this the 6 day
 of June 1961

Bettye Frink
 Bettye Frink
 Secretary of State

Enclosures: Return Receipt Card and copy
 of Summons and Complaint.
 cc: Messrs. Horne, Webb and Tucker
 Attorneys at Law
 P. O. Box 655
 Atmore, Alabama

Law Offices of
Horne, Webb & Tucker

Attorneys at Law

Atmore, Ala.

May 2, 1961

FRANK G. HORNE
DOUGLAS S. WEBB
J. R. TUCKER

TELEPHONE 49

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

Dear Mrs. Duck:

We are sending a suit for Mrs. Mable Marie Ragan against Gasper Lazzara which we desire filed in your Court. Mr. Gasper Lazzara resides at P. O. Box 11117, Tampa 10, Florida, and we will wish service by registered mail through the Secretary of State.

We enclose herewith our check in the amount of \$3.50 to the Secretary of State.

Very truly yours,

HORNE, WEBB & TUCKER



BY: Frank G. Horne

FGH/vje

Enclosures

C I R C U I T C O U R T

STATE OF ALABAMA I

BALDWIN COUNTY I

TO: ANY SHERIFF OF THE STATE OF ALABAMA.
GREETINGS:

You are hereby commanded to summons Gasper Lazzara to appear within thrity (30) days from the service of this writ in the Circuit Court of Baldwin County, Alabama, to be held for said county at the place of holding same, then and there to answer, plead or demur to the complaint of Mrs. Mable Marie Ragan.

Witness my hand, this 3 day of May, 1961.

Alice J. Newkirk
CLERK.

* * * * *

C O M P L A I N T

MRS. MABLE MARIE RAGAN,

PLAINTIFF.

VS.

GASPER LAZZARA,

DEFENDANT.

I

I

I

I

I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER: 4694.

COUNT ONE.

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Plaintiff was caused to sustain and did sustain a Cerebral concussion; Plaintiff suffered multiple lacerations of the face requiring over two hundred stitches to close; Plaintiff suffered severe shock due to hemorrhage from facial lacerations and multiple contusions and abrasions; plaintiff's right ankle was fractured; plaintiff was permanently disfigured; plaintiff was internally injured and permanently injured; plaintiff's nervous system was greatly shocked and impaired and permanently shocked and impaired; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was caused to suffer great physical pain and mental anguish and was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries; plaintiff was caused to incur large doctor, hospital and medical bills in the treatment of her said wounds; plaintiff was made sick, sore and lame for a long period of time; and plaintiff avers that her said injuries were proximately caused by reason and as a proximate consequence of the negligence of the agent, servant or employee of defendant while acting within the line and scope of his employment with the defendant, in this, that said agent, servant or employee so negligently operated the truck of defendant on the occasion complained of as to cause said truck to run over, upon or against the automobile in which plaintiff was then and there riding as a passenger and as a proximate consequence injured plaintiff as aforesaid.

COUNT TWO.

The plaintiff claims of the defendant the sum of Seventy-five Thousand and No/100 (\$75,000.00) Dollars, as damages for that on, to-wit; the 7th day of February, 1961, while plaintiff was riding as a passenger in an automobile over which plaintiff had no charge, direction or control on a public highway, to-wit; U. S. #90 at a point on said public highway approximately 4.3 miles East of Mobile, Alabama, in Baldwin County, Alabama, Eugene Morris, the agent, servant or employee of defendant while acting within the line and scope of his employment with defendant negligently drove a truck of defendant across the said public highway causing the automobile in which plaintiff was then and there riding as a passenger to collide with the truck of defendant and as a proximate result of said negligence of the agent, servant or employee of defendant while acting within the line and scope of his employment with defendant the plaintiff was severely and permanently injured in this, to-wit:

Plaintiff was caused to sustain and did sustain a cerebral concussion; plaintiff suffered multiple lacerations of the face requiring over two hundred stitches to close; plaintiff suffered severe shock due to hemorrhage from facial lacerations and multiple contusions and abrasions; plaintiff's right ankle was fractured; plaintiff was permanently disfigured; plaintiff's nervous system was greatly shocked and

impaired and permanently shocked and impaired; plaintiff's physical stamina was impaired and permanently impaired; plaintiff was caused to suffer great physical pain and mental anguish and was put to much trouble, annoyance, inconvenience and loss of time in and about an effort to heal and cure her said wounds and injuries; plaintiff was caused to incur large doctor, hospital and medical bills in the treatment of her said wounds; plaintiff was made sick, sore and lame for a long period of time hence this suit.

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Plaintiff avers that her said injuries were proximately caused by reason and as a proximate consequence of the negligence of the said agent, servant or employee of the defendant while acting within the line and scope of his employment with defendant, in this, that said

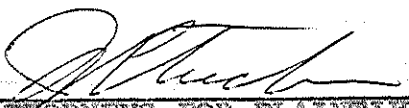
agent, servant or employee negligently obstructed or blocked the said public highway at the time and place set out herein hence this suit.

COURT FOUR.

The plaintiff claims of the defendant the sum of Seventy-five Thousand and No/100 (\$75,000.00) Dollars, as damages for that, on to-wit; the 7th day of February, 1961, while plaintiff was riding as a passenger in an automobile over which plaintiff had no charge, direction or control on a public highway, to-wit; U. S. #90 at a point on said public highway approximately 4.3 miles East of Mobile, Alabama, in Baldwin County, Alabama, Eugene Morris, the agent, servant, or employee of defendant while acting within the line and scope of his employment with defendant wilfully and wantonly ran a truck of defendant over, upon or against the automobile in which plaintiff was then and there riding as a passenger and as a proximate consequence of the wilful and wanton conduct of the said Eugene Morris the agent, servant or employee of defendant the plaintiff was wantonly injured in this, to-wit:

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HORNE, WEBB & TUCKER
BY:

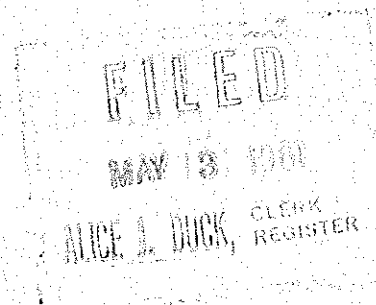
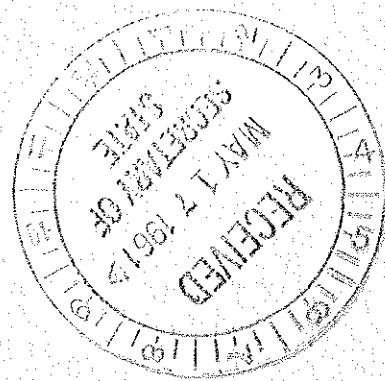

ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved in this cause.

HORNE, WEBB & TUCKER
BY:


ATTORNEYS FOR PLAINTIFF.

14694



Law Offices of
Horne, Webb & Tucker
Attorneys at Law
Atmore, Alabama

MRS. MABLE MARIE RAGAN VS. CASTRO, MINZARA

INSTRUCTIONS TO DELIVERING EMPLOYEE

☒ Deliver only to addressee ☐ Show address where delivered (Additional charges assessed for these services)

RETURN RECEIPT

Received the numbered article described on other side

SIGNATURE OF NAME OF ADDRESSEE (must be in full print)

Mable Marie Ragan

SIGNATURE OF DELIVERING AGENT IF ANY

[Signature]

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED *5-22* ADDRESS WHERE DELIVERED TO (must be in full print)

[Address]

POST OFFICE DEPARTMENT
GENERAL DELIVERY

RENTAL OF PRIVATE BOXES
PAYMENT REQUIRED \$3.00



INSTRUCTIONS: Return to sender
place on other side when applied to
return and attach to back of mail
on front of article for return

REGISTERED NO.

NAME OF SENDER

DATE

RETURN

POSTAGE NO.

SECRETARY OF STATE

INSURED NO.

CIVIL SERVICE COMMISSION

CITY, ZONE AND STATE

POST OFFICE DEPARTMENT

1961-11-11