

DAVID BARK  
ATTORNEY AT LAW  
~~4230 BRYANT STREET~~  
MOBILE, ALABAMA  
—  
HEMLOCK 2-4481  
2813 Springhill Avenue  
May 5, 1961

4698

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

Re: Myers vs Dale

Dear Mrs. Duck:

Will you please file the enclosed suit for me?

The only address I have for the defendant is Montrose,  
Alabama.

Your help is appreciated.

Very truly yours,

*David Bark*

David Bark

encl.  
DB/esb

ROY R. MYERS,  
Plaintiff,

VS

MARION DALE,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Case #

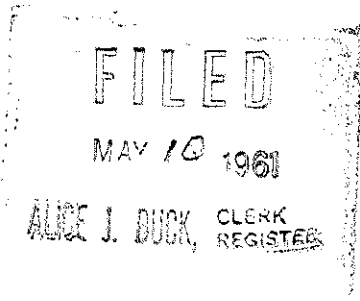
4698

COUNT ONE

Plaintiff claims of the Defendant the sum of \$300.00 as damages for heretofore on, to-wit, May 14, 1960, the Plaintiff's automobile being driven by James D. Myers on, to-wit Highway # 98, a public street or highway, in the city of Daphne, Baldwin County, Alabama, and at said time and place the Defendant negligently drove his automobile into the automobile of the Defendant and as a proximate result and consequence thereof the Defendant's automobile was badly bent, broken, torn and damaged and was lessened in value, hence this suit.

David Bark  
ATTORNEY FOR PLAINTIFF

Serve Defendant:  
Montrose, Alabama



SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4698

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Marion Dale

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

Marion Dale, Defendant

by Roy R. Myers

Plaintiff

Witness my hand this 10 day of May 19 61

Clerk

No. 4698

Page

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

ROY R. MYERS

Plaintiffs

VS.

MARION DALE

Defendants

**Summons and Complaint**

Filed

**FILED**

19

**MAY 10 1961**

Clerk

**ALICE J. DUCK, CLERK REGISTER**

David Bark

2813 Springhill Ave Plaintiff's Attorney  
Mobile, Ala.

Defendant's Attorney

Defendant lives at

Received In Office

*May 10*, 19*61*

Sheriff.

I have executed this summons

this *13 May*, 19*61*

by leaving a copy with

*Marion Dale*

Sheriff claims *55* miles at

Ten Cents per mile Total \$ *5.50*

**TAYLOR WILKINS, Sheriff**

BY

*W. O. Garner*  
**DEPUTY SHERIFF**

*Taylor Wilkins*

Sheriff.

*W. O. Garner*

Deputy Sheriff.

*Montrose*