

HERTZ CORPORATION,  
a corporation,

Plaintiff,

vs.

MRS. ALMA LINAM, as Adminis-  
tratrix of the Estate of  
R. G. Linam, deceased, and  
JOHN DOE and RICHARD ROE and  
X COMPANY and Y CORPORATION  
and M, The Administratrix of  
the Estate of JOHN DOE, the  
driver, and Z, the owner of  
the motor vehicle which collided  
with the motor vehicle belonging  
to the Plaintiff as alleged in  
the Complaint, all of whose true  
names are otherwise unknown to  
the Plaintiff but which will be  
added by amendment when ascertained,

Defendants.

\* IN THE CIRCUIT COURT

\* OF BALDWIN COUNTY,

\* ALABAMA

\* AT LAW

\* NO. 4724

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Comes now the Plaintiff in the above styled cause  
and respectfully represents and shows unto this Honorable  
Court that more than thirty days have elapsed from the  
date of service of the complaint in said cause upon the  
Defendant, Mrs. Alma Linam as Administratrix of the  
Estate of R. G. Linam, deceased;

WHEREFORE, the Plaintiff moves that judgment by  
default will be entered against the Defendant, Mrs. Alma  
Linam as Administratrix of the Estate of R. G. Linam,  
deceased, with leave to prove damages at a later date.

FILED

JUL 11 1909

ALICE J. DUCK, CLERK  
REGISTER

McCORMY, TURNER, JOHNSTONE, ADAMS & MAY

By

*Charles B. Bailey Jr.*  
Attorneys for Plaintiff

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY  
ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING  
HEMLOCK 3-5561 P. O. BOX 1070

MOBILE 6, ALABAMA

GESSNER T. MCCORVEY  
BEN D. TURNER  
C. A. L. JOHNSTONE, JR.  
R. F. ADAMS  
JAMES L. MAY, JR.  
ALEX T. HOWARD, JR.  
J. JEPHTHA HILL  
CHARLES B. BAILEY, JR.  
C. M. A. ROGERS, III

July 10, 1961

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

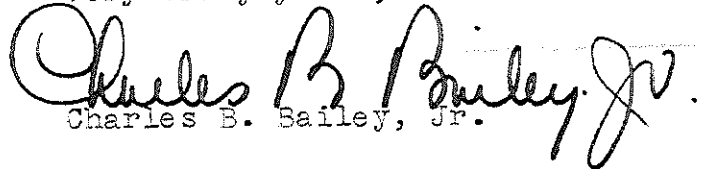
Re: The Hertz Corporation vs.  
Alma Linam, et als  
Case No. 4724

Dear Mrs. Duck:

In accordance with our telephone conversation of today, I would appreciate your causing a default judgment to be entered in the above styled cause against Mrs. Alma Linam as ~~representative~~ *Administratrix* of the estate of R. G. Linam, deceased, with leave to prove damages at a later date. In the event that a formal motion to that effect is necessary, I am enclosing herewith same with the request that you file same if such is necessary.

Your cooperation is very much appreciated.

Very truly yours,

  
Charles B. Bailey, Jr.

CBBjr/nmt

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4724

TERM, 19\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MRS. ALMA LINAM

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

MRS. ALMA LINAM, ET AL

, Defendant

by HERTZ CORPORATION, A CORP.

, Plaintiff

Witness my hand this 5th day of June 19 61

Alma J. Jack, Clerk

HERTZ CORPORATION,  
a corporation,

Plaintiff,

vs.

MRS. ALMA LINAM, as Adminis-  
tratrix of the Estate of  
R. C. LINAM, deceased, and  
JOHN DOE and RICHARD ROE and  
X COMPANY and Y CORPORATION  
and M, the Administratrix of  
the Estate of JOHN DOE, the  
driver, and Z, the owner of  
the motor vehicle which collided  
with the motor vehicle belong-  
ing to the Plaintiff as alleged  
in the Complaint, all of whose  
true names are otherwise unknown  
to the Plaintiff but which will  
be added by amendment when  
ascertained,

Defendants.

\* IN THE CIRCUIT COURT

\* OF BALDWIN COUNTY,

\* ALABAMA

\* AT LAW

\* NO. \_\_\_\_\_

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Plaintiff claims of the Defendants the sum of  
Three Thousand Five Hundred and No/100 (\$3,500.00)  
Dollars as damages for that heretofore and on, to-wit,  
the 10th day of June, 1960, while a motor truck be-  
longing to the Plaintiff was being operated in an  
eastwardly direction on U. S. Highway 90 at or near a  
point on said U. S. Highway 90 in front of the Lovell  
Motel in or near the town of Loxley, Alabama, said  
U. S. Highway 90 at said time and place being a public  
street or highway in the County of Baldwin, State of  
Alabama, the Defendants intestate so negligently  
operated a motor vehicle in a westwardly direction on  
said U. S. Highway 90 at said time and place as to  
cause or allow the same to run into, upon and against  
the motor truck of the Plaintiff, and as a proximate  
consequence and result thereof, the Plaintiff was in-  
jured and damaged as follows: The motor truck of the  
Plaintiff was bent, broken, smashed and otherwise  
damaged and injured; the plaintiff was deprived of the  
use of said motor truck during the time required to  
make the necessary repairs thereon, and the said motor

truck of the Plaintiff was caused to depreciate greatly in value as a result of said damages.

Plaintiff avers that all of the aforementioned injuries and damages were caused as a proximate result of the aforesaid negligence of the Defendants intestate in and about the operation of said motor vehicle at said time and place, as aforesaid.

MCCORVEY, TURNER, JOENSTONE, ADAMS & MAY

By Charles B. Bailey Jr.  
Attorneys for Plaintiff

Defendants' address:  
The address of the defendant  
Mrs. Alma Linam is Route 1,  
Repton, Alabama, believed to  
be in Monroe County.

RECEIVED  
MAY 9 1931  
MAY 9 1931  
MAY 9 1931

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY  
ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING  
HEMLOCK 3-5561 P. O. BOX 1070  
MOBILE 6, ALABAMA

GESSNER T. MCCORVEY  
BEN D. TURNER  
C. A. L. JOHNSTONE, JR.  
R. F. ADAMS  
JAMES L. MAY, JR.  
ALEX T. HOWARD, JR.  
J. JERETHA HILL  
CHARLES B. BAILEY, JR.  
C. M. A. ROGERS, JR.

June 2, 1961

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

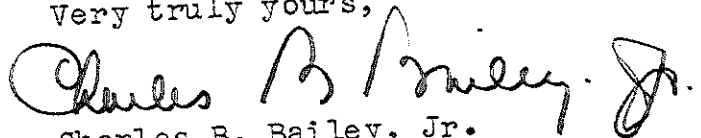
Re: Hertz Corporation vs.  
Mrs. Alma Linam, et als

Dear Mrs. Duck:

We enclose herewith ~~summons and~~ complaint for  
filing in your court in the above styled action.

It would be appreciated if you would acknowledge  
receipt of same in the enclosed self-addressed, stamped  
envelope.

Very truly yours,

  
Charles B. Bailey, Jr.

CBBjr/nmt

MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY  
ATTORNEYS AT LAW

NINTH FLOOR MERCHANTS NATIONAL BANK BUILDING

HEMLOCK 3-5561 P. O. BOX 1070

MOBILE 6, ALABAMA

GESSNER T. MCCORVEY  
BEN D. TURNER  
C. A. L. JOHNSTONE, JR.  
R. F. ADAMS  
JAMES L. MAY, JR.  
ALEX T. HOWARD, JR.  
J. JEPHTHA HILL

CHARLES B. BAILEY, JR.  
C. M. A. ROGERS, III

September 28, 1961

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

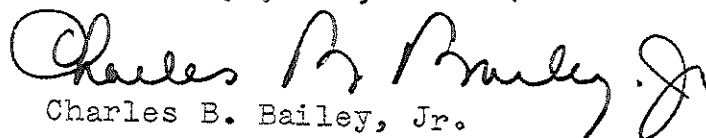
Re: The Hertz Corporation vs.  
Mrs. Alma Linam, et als  
Case No. 4724

Dear Mrs. Duck:

I enclose herewith our firm check in the amount  
of \$1.00 and will appreciate your forwarding me two  
certificates of judgment in the above styled case.

Your cooperation is very much appreciated.

Very truly yours,

  
Charles B. Bailey, Jr.

CBBjr/nmt

HERTZ CORPORATION,  
a corporation,

Plaintiff,

vs.

MRS. ALMA LINAM, as Adminis-  
tratrix of the Estate of  
R. G. LINAM, deceased, and  
JOHN DOE and RICHARD ROE and  
X COMPANY and Y CORPORATION  
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with the motor vehicle belong-  
ing to the Plaintiff as alleged  
in the Complaint, all of whose  
true names are otherwise unknown  
to the Plaintiff but which will  
be added by amendment when  
ascertained,

Defendants.

\* IN THE CIRCUIT COURT

\* OF BALDWIN COUNTY,

\* ALABAMA

\* AT LAW

\* NO. 4223

\*

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Plaintiff claims of the Defendants the sum of  
Three Thousand Five Hundred and No/100 (\$3,500.00)  
Dollars as damages for that heretofore and on, to-wit,  
the 10th day of June, 1960, while a motor truck be-  
longing to the Plaintiff was being operated in an  
eastwardly direction on U. S. Highway 90 at or near a  
point on said U. S. Highway 90 in front of the Lovell  
Motel in or near the town of Loxley, Alabama, said  
U. S. Highway 90 at said time and place being a public  
street or highway in the County of Baldwin, State of  
Alabama, the Defendants' intestate so negligently  
operated a motor vehicle in a westwardly direction on  
said U. S. Highway 90 at said time and place as to  
cause or allow the same to run into, upon and against  
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consequence and result thereof, the Plaintiff was in-  
jured and damaged as follows: The motor truck of the  
Plaintiff was bent, broken, smashed and otherwise  
damaged and injured; the plaintiff was deprived of the  
use of said motor truck during the time required to  
make the necessary repairs thereon, and the said motor



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MCCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By Charles B. Briley, Jr.  
Attorneys for Plaintiff

Defendants' address:  
The address of the defendant  
Mrs. Alma Linam is Route 1,  
Repton, Alabama, believed to  
be in Monroe County.

FILED

JUN 5 1961

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4724

TERM, 19

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MRS. ALMA LINAM, ET AL, Defendant

by HERTZ CORPORATION, A CORP.

Plaintiff

Witness my hand this 5th day of June 19 61

Clerk

No. 4724 Page       

The State of Alabama

Baldwin County

CIRCUIT COURT

HERTZ CORPORATION, A CORP.

Plaintiffs

vs.

MRS. ALMA LINAM, As Administratrix  
of the Estate of R.G. Linam, deceased  
ET ALS

Defendants

Summons and Complaint

Filed May June 5, 1961

Alice J. Duck Clerk

The Sheriff Claims 20  
Miles at 10c Per Mile  
For a Total of \$ 2.00  
Charlie Sizemore, Sheriff  
Monroe County, Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

Sheriff

I have executed this summons

this June 8th 19 61

by leaving a copy with

Mrs Alma Linam

Charlie Sizemore Sheriff  
E. P. Watson Deputy Sheriff