

AMENDED COMPLAINT

BERNARD WHITE

X

Plaintiff

X

IN THE CIRCUIT COURT OF

VS

X

BALDWIN COUNTY, ALABAMA

JAMES MCAFFEE and
RANDOLPH L. SELLARS

X

AT LAW

NO.

5076

Defendants

X

)(

COUNT ONE:

The plaintiff claims of the defendants the sum of Five Thousand (\$5,000.00) Dollars as damages, for that, heretofore, on, to-wit, the 15th day of March, 1961, plaintiff avers his wife, Edna B. White, was operating an automobile pickup truck on a public highway, U. S. Highway numbered 31 in Baldwin County, approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAfee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit: a truck-tractor and trailer then and there, as to cause said motor vehicle, to-wit: a truck-tractor and trailer, he was operating to run over, upon or against the automobile pickup truck which the plaintiff's wife was then and there operating; and plaintiff avers that as a proximate consequence that his wife, was severely injured about the legs, body and back suffering bruises and contusions; and suffering a permanent low back injury whereby she has been disabled and unable to perform her marital duties, and suffered physical pain and mental anguish; and plaintiff was caused to spend large sums of money for hospital, doctor, nursing and medical bills and for help in the performance of the necessary household duties and will incur additional bills for all such costs and expenses; and plaintiff has lost the services and consortium of the said Edna B. White since the date of said injury.

The said Edna B. White was regularly employed and earning a substantial salary at the time of said injury, from which she contributed to help the plaintiff maintain his home and the plaintiff has lost the benefit of the income from her salary since the date of said injury and will continue to lose the benefit thereof.

Plaintiff avers that all of his said damages were caused

as a proximate consequence of the negligence of the said defendant, Randolph L. Sellars, an agent, servant, or employee of the defendant, James McAffee, while acting within the line and scope of his employment as such agent, servant or employee in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid.

COUNT TWO:

The plaintiff claims of the defendants the sum of One Thousand (\$1,000.00) Dollars as damages, for that heretofore, on to-wit: March 15, 1961, the plaintiff's automobile pickup truck was being operated along and upon a public highway, U. S. Highway numbered 31 in Baldwin County, approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where said operator had a right to be, and while said automobile pickup truck was being operated and driven along U. S. Highway numbered 31, aforesaid, Randolph L. Sellars, an agent, servant or employee of James McAffee, while acting within the line and scope of his employment so negligently operated a truck-tractor and trailer then and there as to cause said truck-tractor and trailer which the said Randolph L. Sellars was operating in a negligent manner to run over, upon or against the automobile pickup truck, property of the said plaintiff causing great damage to plaintiff's said motor vehicle, to-wit: striking it on the left side and damaging the said motor vehicle beyond reasonable repair all to the damage of the plaintiff as aforesaid.

The plaintiff alleges that his said damages to his said automobile pickup truck were proximately caused by the negligence of the defendant, in that he negligently caused, allowed or permitted said truck-tractor and trailer to run upon, over or against the automobile pickup truck of the plaintiff and as a proximate consequence thereof, the plaintiff's automobile pickup truck was damaged and injured as aforesaid.

THOMPSON & WHITE

BY: 

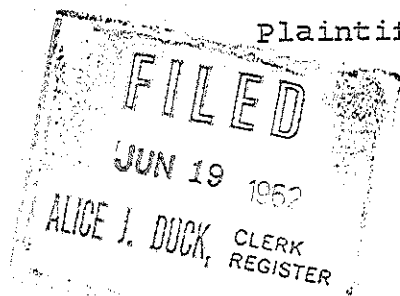
Attorneys for plaintiff.

Plaintiff respectfully demands trial by jury.

THOMPSON & WHITE

BY: 

Attorneys for plaintiff.



BERNARD WHITE,

Plaintiff,

vs.

JAMES McAFFEE and RANDOLPH
L. SELLARS,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5076

Come the Defendants in the above styled cause and demur to the complaint filed in said cause and each and every count thereof, separately and severally, and assign the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That the place where the accident occurred is not sufficiently set out in said complaint.
3. That said complaint does not allege that the accident occurred in Baldwin County, Alabama.
4. That said complaint does not allege any duty owing by the Defendants to the Plaintiff.
5. That said complaint does not allege that the Defendants negligently injured the Plaintiff.
6. That count "ONE" of the complaint does not sufficiently set out the injuries received by the Plaintiff's wife.
7. That this Plaintiff is not entitled to recover for the pain and suffering which his wife suffered.
8. That count "ONE" of the complaint does not allege in what manner the wife of the Plaintiff has become disabled.

Lyon, P. R. & Cook

W. A. Stone
Attorneys for Defendants

FILED

1962

ALICE J. DUCK,

CLERK
REGISTER

FILED

APR 17 1962

ALICE J. DUCK,

CLERK
REGISTER

FILED

1962

153

BERNARD WHITE,

Plaintiff,

vs.

JAMES McAFFEE and RANDOLPH
L. SELLARS,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5076

* * * * *

DEMURRER

* * * * *

FILED

APR 17 1962

ALICE J. DUCK, CLERK
REGISTER

BERNARD WHITE

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

JAMES MCAFFEE and
RANDOLPH L. SELLARS

X

AT LAW

NO. 5126

Defendants

X

COUNT ONE:

The plaintiff claims of the defendants the sum of Five Thousand (\$5,000.00) Dollars as damages, for that, heretofore, on, to-wit, the 15th day of March, 1961, plaintiff avers his wife, Edna B. White, was operating an automobile pickup truck on a public highway, U. S. Highway numbered 31 approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAfee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit, a truck tractor and trailer then and there, as to cause said motor vehicle, to-wit, a truck tractor and trailer, he was operating to run over, upon or against the automobile pickup truck which the plaintiff's wife was then and there operating; and plaintiff avers that as a proximate consequence there his wife, was severely injured about the legs, body and back suffering bruises and contusions; and suffering a low back injury whereby she has been disabled and unable to perform her marital duties, and suffered physical pain and mental anguish; and plaintiff was caused to spend large sums of money for hospital, doctor, nursing and medical bills and for help in the performance of the necessary household duties and will incur additional bills for all such costs and expenses; and plaintiff has lost the services and consortium of the said Edna B. White since the date of said injury.

The said Edna B. White was regularly employed and earning a substantial salary at the time of said injury, from which she contributed to help the plaintiff maintain his home and the plaintiff has lost the benefit of the income from her salary since the date of said injury and will continue to lose the benefit thereof.

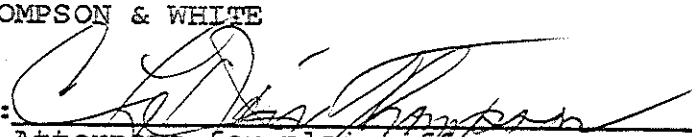
Plaintiff avers that all of his said damages were caused as a proximate consequence of the negligence of the said defendant, Randolph L. Sellars, an agent, servant, or employee of the defendant,

James McAffee, while acting within the line and scope of his employment as such agent, servant or employee in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid.

COUNT TWO


The plaintiff claims of the defendants the sum of One Thousand (\$1,000.00) Dollars as damages for that heretofore, on, to-wit: March 15, 1961, the plaintiff's automobile pickup truck was being operated along and upon a public highway, U. S. Highway numbered 31 approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where said operator had a right to be, and while said automobile pickup truck was being operated and driven along U. S. Highway numbered 31, aforesaid, a truck tractor and trailer which was being driven by Randolph L. Sellars, an agent, servant or employee of James McAffee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit, a truck tractor and trailer then and there, as to cause said motor vehicle, he was operating to run over, upon or against the automobile pickup truck of the said plaintiff causing great damage to plaintiff's said vehicle, to-wit: striking it in the left side and damaging said vehicle beyond reasonable repair, all to the damage of the plaintiff as aforesaid. The plaintiff alleges that his said damages to his said automobile pickup truck were proximately caused by the negligence of the defendant, in that he negligently caused, allowed or permitted said truck tractor and trailer to run upon, over or against the automobile pickup truck of the plaintiff and as a proximate consequence thereof, the plaintiff's automobile pickup truck was damaged and injured as aforesaid.

THOMPSON & WHITE

BY: 
Attorneys for plaintiff

Plaintiff respectfully demands trial by jury.

THOMPSON & WHITE

BY: 
Attorneys for plaintiff

FILED

MAR 12 1962

ALICE J. 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 James McAffee and Randolph L. Sellars

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 _____

James McAffee and Randolph L. Sellars, Defendant S

by Bernard White

_____, Plaintiff _____
Witness my hand this 13 day of March 1962

Alvin J. Duck, Clerk

March 22, 1962

BERNARD WHITE, Plaintiff
VS
JAMES McAFFEE, et al, Defendants

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

CASE NO. 5076

TO THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

I, Bettye Frink, Secretary of State, hereby certify that on March 14, 1962
I sent by registered mail in an envelope addressed as follows:

"
James McAfee
Roswell,
Ga."

"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:

"
James McAfee
Roswell,
Ga."

You will take notice that on March 14, 1962 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: BERNARD WHITE, Plaintiff VS JAMES McAFFEE, et al,
Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 5076 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 14
day of March 1962

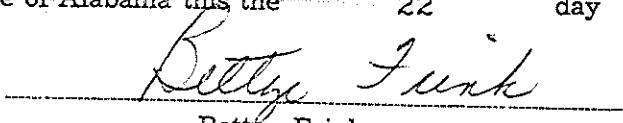
Enclosure (1)

(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 Mar 21 1962 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at _____
on Mar 1- 1962

WITNESS MY HAND and the Great Seal of the State of Alabama this the 22 day
of March 1962


Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable C. LeNoir Thompson
Attorney at Law
124 Court House Sq.
Bay Minette, Ala.

BERNARD WHITE

Plaintiff

VS

JAMES MCAFFEE and
RANDOLPH L. SELLARS

Defendants

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

COUNT ONE:

The plaintiff claims of the defendants the sum of Five Thousand (\$5,000.00) Dollars as damages, for that, heretofore, on, to-wit, the 15th day of March, 1961, plaintiff avers his wife, Edna B. White, was operating an automobile pickup truck on a public highway, U. S. Highway numbered 31 approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAfee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit, a truck tractor and trailer then and there, as to cause said motor vehicle, to-wit, a truck tractor and trailer, he was operating to run over, upon or against the automobile pickup truck which the plaintiff's wife was then and there operating; and plaintiff avers that as a proximate consequence there his wife, was severely injured about the legs, body and back suffering bruises and contusions; and suffering a low back injury whereby she has been disabled and unable to perform her marital duties, and suffered physical pain and mental anguish; and plaintiff was caused to spend large sums of money for hospital, doctor, nursing and medical bills and for help in the performance of the necessary household duties and will incur additional bills for all such costs and expenses; and plaintiff has lost the services and consortium of the said Edna B. White since the date of said injury.

The said Edna B. White was regularly employed and earning a substantial salary at the time of said injury, from which she contributed to help the plaintiff maintain his home and the plaintiff has lost the benefit of the income from her salary since the date of said injury and will continue to lose the benefit thereof.

Plaintiff avers that all of his said damages were caused as a proximate consequence of the negligence of the said defendant, Randolph L. Sellars, an agent, servant, or employee of the defendant,

James McAffee, while acting within the line and scope of his employment as such agent, servant or employee in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid.

COURT TWO


The plaintiff claims of the defendants the sum of One Thousand (\$1,000.00) Dollars as damages, for that heretofore, on, to-wit: March 15, 1961, the plaintiff's automobile pickup truck was being operated along and upon a public highway, U. S. Highway numbered 31 approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where said operator had a right to be, and while said automobile pickup truck was being operated and driven along U. S. Highway numbered 31, aforesaid, a truck tractor and trailer which was being driven by Randolph L. Sellars, an agent, servant or employee of James McAffee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit, a truck tractor and trailer then and there, as to cause said motor vehicle, he was operating to run over, upon or against the automobile pickup truck of the said plaintiff causing great damage to plaintiff's said vehicle, to-wit: striking it in the left side and damaging said vehicle beyond reasonable repair, all to the damage of the plaintiff as aforesaid. The plaintiff alleges that his said damages to his said automobile pickup truck were proximately caused by the negligence of the defendant, in that he negligently caused, allowed or permitted said truck tractor and trailer to run upon, over or against the automobile pickup truck of the plaintiff and as a proximate consequence thereof, the plaintiff's automobile pickup truck was damaged and injured as aforesaid.

THOMPSON & WHITE

BY: 
Attorneys for plaintiff

Plaintiff respectfully demands trial by jury.

THOMPSON & WHITE

BY: 
Attorneys for plaintiff

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 James McAffee and Randolph L. Sellars

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 _____

James McAffee and Randolph L. Sellars, Defendant----

by Bernard White

_____, Plaintiff----

Witness my hand this 13 day of March, 1962

Alice J. Duck, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

BERNARD WHITE

Plaintiffs

vs.

RANDOLPH L. SELLARS

JAMES MCAFFEE

Defendants

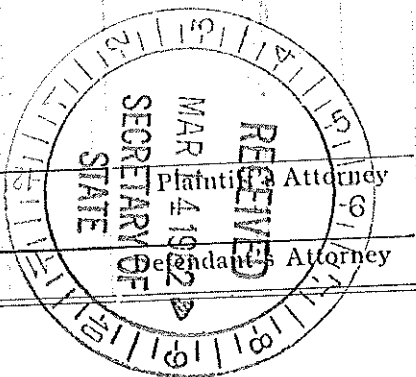
SUMMONS and COMPLAINT

Filed _____, 19____

FILED

_____, Clerk

ALICE J. DUCK, CLERK
REGISTER



Defendant lives at
Randolph L. Sellars, Rt. 2
Acworth, Georgia
James McAfee, Roswell, Ga.

RECEIVED IN OFFICE

_____, 19____

_____, Sheriff

I have executed this summons

this _____, 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

March 22, 1962

BERNARD WHITE, Plaintiff
 VS
 RANDOLPH L. SELLARS, et al, Defendants

IN THE CIRCUIT COURT OF BALDWIN
 COUNTY, ALABAMA AT LAW

CASE NO. 5076

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

I, Bettye Frink, Secretary of State, hereby certify that on March 14, 1962
 I sent by registered mail in an envelope addressed as follows:

" Randolph L. Sellars
 Rt. 2
 Acworth, Georgia

"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:

" Randolph L. Sellars
 Rt. 2
 Acworth, Georgia

You will take notice that on March 14, 1962 the Sheriff of Montgomery County, Alabama, served upon me, in my official capacity, summons and complaint in a case entitled: BERNARD WHITE, Plaintiff VS RANDOLPH L. SELLARS, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
 Case No. 5076 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 14
 day of March 1962

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 Mar 21 1962 I received the return card, showing receipt by the designated addressee of the aforementioned matter at Rocky Face -- on 3-20-62

WITNESS MY HAND and the Great Seal of the State of Alabama this the 22 day
 of March 1962

Bettye Frink

Bettye Frink
 Secretary of State

Enclosures: Return Receipt Card and copy
 of Summons and Complaint.

cc: Honorable C. LeNoir Thompson
 Attorney at Law
 124 Court House Sq.
 Bay Minette, Ala.

BERNARD WHITE

X

Plaintiff

X

IN THE CIRCUIT COURT OF

VS

X

BALDWIN COUNTY, ALABAMA

JAMES MCAFFEE and
RANDOLPH L. SELLARS

X

AT LAW

NO. _____

Defendants

X

COUNT ONE:

The plaintiff claims of the defendants the sum of Five Thousand (\$5,000.00) Dollars as damages, for that, heretofore, on, to-wit, the 15th day of March, 1961, plaintiff avers his wife, Edna B. White, was operating an automobile pickup truck on a public highway, U. S. Highway numbered 31 approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAfee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit, a truck tractor and trailer then and there, as to cause said motor vehicle, to-wit, a truck tractor and trailer, he was operating to run over, ~~upon or against the automobile pickup truck which the plaintiff's~~ wife was then and there operating; and plaintiff avers that as a proximate consequence there his wife, was severely injured about the legs, body and back suffering bruises and contusions; and suffering a low back injury whereby she has been disabled and unable to perform her marital duties, and suffered physical pain and mental anguish; and plaintiff was caused to spend large sums of money for hospital, doctor, nursing and medical bills and for help in the performance of the necessary household duties and will incur additional bills for all such costs and expenses; and plaintiff has lost the services and consortium of the said Edna B. White since the date of said injury.

The said Edna B. White was regularly employed and earning a substantial salary at the time of said injury, from which she contributed to help the plaintiff maintain his home and the plaintiff has lost the benefit of the income from her salary since the date of said injury and will continue to lose the benefit thereof.

Plaintiff avers that all of his said damages were caused as a proximate consequence of the negligence of the said defendant, Randolph L. Sellars, an agent, servant, or employee of the defendant,

Plaintiff avers that all of his said damages were caused as a proximate consequence of the negligence of the said defendant, Randolph L. Sellers, agent, servant, or employee of the defendant, of said injury and will continue to lose the benefit thereof.

The said Edna B. White was regularly employed and earning a substantial salary at the time of said injury, from which she contributed to help the plaintiff maintain his home and the plaintiff has lost the benefit of the income from her salary since the date since the date of said injury.

has lost the services and consortium of the said Edna B. White our additional bills for all such costs and expenses; and plaintiff in the performance of the necessary household duties and will in- money for hospital, doctor, nursing and medical bills and for help mental anguish; and plaintiff was caused to spend large sums of able to perform her marital duties, and suffered physical pain and suffering a low back injury whereby she has been disabled and un- the legs, body and back suffering bruises and contusions; and proximate consequence there his wife, was severely injured about wife was then and there operating; and plaintiff avers that as a to-wit, a truck tractor and trailer, he was operating to run over, tractor and trailer then and there, as to cause said motor vehicle, ment, so negligently operated his motor vehicle, to-wit, a truck James McAfee, while acting within the line and scope of his employ- Randolph L. Sellers, an agent, servant or employee of the defendant, Community of Perdido, where she had a right to be, and the defendant, the City Limits of Bay Minette, Baldwin County, Alabama, near the highway, U. S. Highway numbered 31 approximately 12 miles East of Edna B. White, was operating an automobile pickup truck on a public to-wit, the 15th day of March, 1961, plaintiff avers his wife, Thousand (\$5,000.00) Dollars as damages, for that, heretofore, on, The plaintiff claims of the defendants the sum of Five

COUNT ONE:

BERNARD WHITE	X	IN THE CIRCUIT COURT OF	AT LAW	NO. _____
vs	X	BALDWIN COUNTY, ALABAMA		
Plaintiff	X			
JAMES MCAFEE and	X			
RANDOLPH L. SELLARS	X			
Defendants	X			

James McAffee, while acting within the line and scope of his employment as such agent, servant or employee in and about the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid.

COUNT TWO

The plaintiff claims of the defendants the sum of one thousand (\$1,000.00) dollars as damages for that heretofore, on, to-wit: March 15, 1961, the plaintiff's automobile pickup truck was being operated along and upon a public highway, U. S. Highway numbered 31 approximately 12 miles east of the city limits of Bay Minette, Baldwin County, Alabama, near the community of Perdido, where said operator had a right to be, and while said automobile pickup truck was being operated and driven along U. S. Highway numbered 31, aforesaid, a truck tractor and trailer which was being driven by Randolph L. Sellers, an agent, servant or employee of James McAffee, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit, a truck tractor and trailer then and there, as to cause said motor vehicle, to-wit, he was operating to run over, upon or against the automobile pickup truck of the said plaintiff causing great damage to plaintiff's said vehicle, to-wit: striking it in the left side and damaging said vehicle beyond reasonable repair, all to the damage of the plaintiff as aforesaid. The plaintiff alleges that his said damages to his said automobile pickup truck were proximately caused by the negligence of the defendant, in that he negligently caused, allowed or permitted said truck tractor and trailer to run upon, over or against the automobile pickup truck of the plaintiff and as a proximate consequence thereof, the plaintiff's automobile pickup truck was damaged and injured as aforesaid.

Plaintiff respectfully demands trial by jury.

THOMPSON & WHITE

Attorneys for Plaintiff

Plaintiff respectfully demands trial by jury.

THOMPSON & WHITE

Attorneys for Plaintiff

THOMPSON & WHITE

Attorneys for Plaintiff

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 James McAfee and Randolph L. Sellars

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 _____

James McAfee and Randolph L. Sellars, Defendant____

by Bernard White

_____, Plaintiff____

Witness my hand this

1st

day of

March

1962

Oliver J. Duck, Clerk

5076

Page

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

BERNARD WHITE

Plaintiffs

vs.

RANDOLPH L. SELLARS

JAMES McAFFEE

Defendants

SUMMONS and COMPLAINT

Filed

19

FILED

Clerk

MAR 12 1962

ALICE J. DUCK

CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Randolph L. Sellars, Rt. 2

Acworth, Georgia

James McAfee, Roswell, Ga.

RECEIVED IN OFFICE

19

Sheriff

I have executed this summons

this

19

by leaving a copy with

Sheriff

Deputy Sheriff

BERNARD WHITE VS RANOLDPH D. SEELARS, et al

#1- INSTRUCTIONS TO DELIVERING EMPLOYEE

☒ Deliver ONLY to addressee

☒ Show address where delivered

5076

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side

SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

Ranoldph D. Seelars

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED

8-22-62

ADDRESS WHERE DELIVERED (only if delivered other than to)

RECEIVED BY MAIL
MAR 1 1962

BERNARD WHITE VS JAMES McARTHUR, et al

#1- INSTRUCTIONS TO DELIVERING EMPLOYEE

☒ Deliver ONLY to addressee

☒ Show address where delivered

5076

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side

SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

James McArthur

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

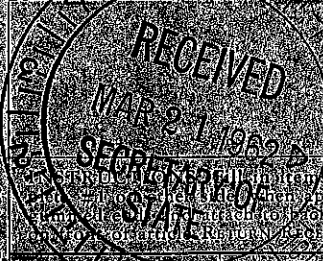
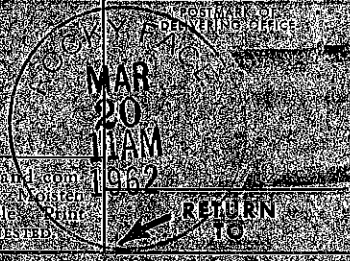
DELIVER TO ADDRESSEE ONLY

DATE DELIVERED


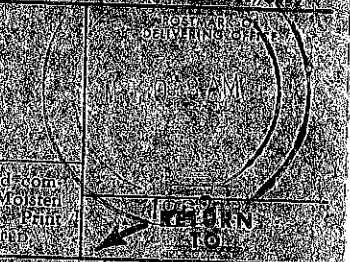
MAR 1 1962

ADDRESS WHERE DELIVERED (only if delivered other than to)

RECEIVED BY MAIL
MAR 1 1962

POST OFFICE DEPARTMENT OFFICIAL BUSINESS		PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$100	
			
REGISTERED NO. 4413		NAME OF BENEFITARY	
CERTIFIED NO.		STREET AND NO. OR R.F.D. BOX	
INSURED NO.		CITY, ZONE AND STATE	
		SECRETARY OF STATE MONTGOMERY, ALABAMA	

POD Form 3811

POST OFFICE DEPARTMENT OFFICIAL BUSINESS		PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$100	
			
REGISTERED NO. 4413		NAME OF BENEFITARY	
CERTIFIED NO.		STREET AND NO. OR R.F.D. BOX	
INSURED NO.		CITY, ZONE AND STATE	
		SECRETARY OF STATE MONTGOMERY, ALABAMA	

POD Form 3811