March 22, 1962

CLARA WHITE, Plaintiff COUNTY, ALABAMA AT LAW

RANDOLPH L. SELLARS, et al, Defendants

CASE NO. 5077

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:

March 14, 1962

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: CLARA WHITE, Plaintiff VS RANDOLPH L. SELLARS, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. 5077 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 day of March 1962

14

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

dav

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.

CLARA 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	3	X	

COUNT ONE:

The plaintiff claims of the defendants the sum of Twentyfive Hundred (\$2500.00) Dollars as damages, for that, heretofore, on, to-wit, the 15th day of March, 1961, the Plaintiff was a passenger in 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 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, a truck tractor and trailer, he was operating torum over, upon or against the automobile pickup truck in which the plaintiff was then and there a passenger; and plaintiff avers that as a proximate consequence thereof she was injured severely about the body and knees, suffering bruises and contusions; and suffering injuries to her knees and to her body whereby she was disabled and unable to perform her duties as a wife or housekeeper and was hospitalized and operated on, all to her damage in the sum aforesaid. And plaintiff avers that all of her said injuries were proximately caused by the said negligence of the said defendant, Randolph L. Sellars, an agent, servant, or employee of the defendant, James McAffes, 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:

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The plaintiff claims of the defendants the sum of Twentyfive Hundred (\$2500100) as damages, for that, heretofore, on to-wit
the 15th day of March, 1961, the plaintiff was a passenger in 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 McAffee, while acting within the line and scope of his employment, so wilfully and wantonly operated his motor vehicle, to-wit, a truck tractor and trailer, then and there, as to cause said motor vehicle, towit, a truck tractor and trailer, he was operating to run over, upon or against the automobile pickup truck in which the plaintiff was then and there a passenger; and plaintiff avers that as a proximate consequence thereof she was injured severely about the body and knees, suffering bruises and contusions; and suffering injuries to her knees and to her body whereby she was disabled and unable to perform her duties as a wife or housekeeper and was hospitalized and operated on, all toher damage in the sum aforesaid. And plaintiff avers that all of her said injuries were proximately caused by the said wilfulness and wantonness 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 wilful and wanton operation of said motor vehicle at the time and place and on the occasion aforesaid.

THOMPSON & WEITE

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Plaintiff respectfully requests trial by jury.

THOMPSON & WHITE

Attorneys forplaintiff

BALDWI	OF ALAI		URT, BALDWIN COUNTY
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TO ANY SHERIFF	OF THE ST.	ATE OF ALABAMA:	
You Are Hereby Cor	nmanded to Su	mmon James McAffee and Ro	Company of the Compan
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And the Proportional Association and Company of the			And the second of the second o
	200 m V 14	or, within thirty days from the service here, State of Alabama, at Bay Minette, aga	reof, to the complaint filed in
the Circuit Court of	Baldwin County	r, within thirty days from the service here, State of Alabama, at Bay Minette, aga	reof, to the complaint filed in
the Circuit Court of	Baldwin County	r, within thirty days from the service here, State of Alabama, at Bay Minette, aga	reof, to the complaint filed in
the Circuit Court of	Baldwin County	r, within thirty days from the service here, State of Alabama, at Bay Minette, aga	reof, to the complaint filed in

No. 50.72 Page	
THE STATE OF ALABAMA BALDWIN COUNTY	Defendant lives at Randolph L. Sellars, Rt. 2 Acworth, Georgia
CIRCUIT COURT	James McAffee, Roswell, Ga. RECEIVED IN OFFICE
	, 19
CLARA WHITE	, Shériff
Plaintiffs vs.	I have executed this summons
	this,19
JAMES MCAPFEE RANDOLPH L. SELLARS	by leaving a copy with
Defendants	
SUMMONS and COMPLAINT	
Filed	
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AUCE J. DUCK, G. ERK REGISTER	
司皇皇皇 1	
Plaintiff Attorney	
Defendant's Attorney	Sheriff Deputy Sheriff

March 22, 1962

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

CLARA WHITE, Plaintiff et al, Defendants JAMES MCAFFEE,

CASE NO. 5077

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

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

James McAffee Roswell,

"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 McAffee Roswell, Ga.

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 You will take notice that on case entitled: CLARA WHITE, Plaintiff VS JAMES McAFFEE, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW a true copy of which summons and complaint is attached hereto Case No. 5077 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 March 1962 day of

14

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 received the return card, showing Mar 21 1962 I further certify that on Roswel- Ga. receipt by the designated addressee of the aforementioned matter at Mar 19 1962

WITNESS MY HAND and the Great Seal of the State of Alabama this the

March 1962

Bettye Frink Secretary of State

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

Honorable C. LeNoir Thompson cc:

Attorney atLaw 124 Court House Sq. Bay Minette, Ala.

CLARA WHITE	X		
Plaintiff	X	IN THE CIRC	CUIT COURT OF
vs	X	BALDWIN CO	INTY, ALABAMA
JAMES MCAFFEE and RANDOLPH L. SELLARS	X	AT LAW	No.
	X	· ** 	
Defendants	χ		

COUNT ONE :

The plaintiff claims of the defendants the sum of Twentyfive Hundred (\$2500.00) Dollars as damages, for that, heretofore, on, to-wit, the 15th day of March, 1961, the plaintiff was a passenger in an automobile pickup truck, on a public highway, U. S. Highway numbered 31 approximately 10 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 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, a truck tractor and trailer, he was operating to run over, upon or against the automobile pickup truck in which the plaintiff was then and there a passenger; and plaintiff avers that as a proximate consequence thereof she was injured severely about the body and knees, suffering bruises and contusions; and suffering injuries to her knees and to her body whereby she was disabled and unable to perform her duties as a wife or housekeeper and was hospitalized and operated on, all to her damage in the sum aforesaid. And plaintiff avers that all of her said injuries were proximately caused by the said 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

CLARA WHITE	X		
Plaintiff	X	IN THE CIR	CUIT COURT OF
vs	X	BALDWIN CO	unty, alabana
JAMES MCAFFEE and	X	AT LAW	NO.
RANDOLPH L. SELLARS	X	;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;	
Defendants	X		

COUNT ONE:

The plaintiff claims of the defendants the sum of Twentyfive Hundred (\$2500.00) Dollars as damages, for that, heretofore, on, to-wit, the 15th day of March, 1961, the plaintiff was a passenger in 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 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, a truck tractor and trailer, he was operating to run over, upon or against the automobile pickup truck in which the plaintiff was then and there a passenger; and plaintiff avers that as a proximate consequence thereof she was injured severely about the body and knees, suffering bruises and contusions; and suffering injuries to her knees and to her body whereby she was disabled and unable to perform her duties as a wife or housekeeper and was hospitalized and operated on, all to her damage in the sum aforesaid. And plaintiff avers that all of her said injuries were proximately caused by the said 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 Twenty-five Hundred (\$2500.00) as damages, for that, heretofore, on to-wit the 15th day of March, 1961, the plaintiff was a passenger in 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. Selbrs, an agent, servant or employee of the defendant, James McAffee, while acting within the line and scope of his employment, so wilfully and wantonly operated his motor vehicle, to-wit, a truck tractor and trailer, then and there, as to cause said motor vehicle, towit, a truck tractor and trailer, he was operating to run over. upon or against the automobile pickup truck in which the plaintiff was then and there a passenger; and plaintiff avers that as a proximate consequence thereof she was injured severely about the body and knees, suffering bruises and contusions; and suffering injuries to her kozes and to her body whereby she was disabled and unable to perform her duties as a wife or housekeeper and was hospitalized and operated on, all to her damage in the sum aforesaid. And plaintiff avers that all of her said injuries were proximately caused by the said wilfulness and wantonness 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 wilful and wanton operation of said motor vehicle at the time and place and on the occasion aforesaid.

THOMPSON & WHITE

seconders for plaintiff

Plaintiff respectfully requests trial by jury.

THOMPSON & WHITE

Actorneys for plaint

	TE OF ALA			COURT, BAI	DWIN COUNTY
					TERM, 19
TO ANY SHE	RIFF OF THE S	TATE OF ALABAM	IA:		
You Are Hereby	Commanded to S	ummon	son files and		. Sellare
72 3 <u>2</u>	· · · · · · · · · · · · · · · · · · ·				
to appear and ple	ead, answer or dem	ur, within thirty days	s from the service	hereof, to the	complaint filed in
Janos 16A1		dolyh L. S el la	123	· · · · · · · · · · · · · · · · · · ·	, Defendant
		-			, Plaintiff
Witness my hand	l this	day of	Marc.	194	6

No. 5077 Page	
THE STATE OF ALABAMA BALDWIN COUNTY	Defendant lives at Randolph L. Sellara, Rt. 2 Acworth, Georgia James AcAffee, Rossell, Ga.
CIRCUIT COURT	RECEIVED IN OFFICE
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Plaintiffs vs.	this,19
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RATIONATI L. SELLARGI	
Defendants	
SUMMONS and COMPLAINT	
Filed	
, Clerk	
ALIGE J. DUBY, CLERK REGISTER	
1977	
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Plaintift's Attorney	Sheri
Defendant's Attorney	Deputy Sheri

Ĭ CLARA WHITE, Plaintiff, [IN THE CIRCUIT COURT OF Ĭ vs. BALDWIN COUNTY, ALABAMA Ĭ JAMES McAFFEE and RANDOLPH NO. 5077 AT LAW X L. SELLARS, Defendants.

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 the complaint.
- 3. That it is not alleged 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 said complaint does not sufficiently set out the injuries received by the Plaintiff.
- 7. That said complaint does not allege how long the Plaintiff was disabled.
- 8. That it is not alleged in said complaint for what length of time the Plaintiff was unable to perform her duties and does not allege for what length of time she was confined in the hospital.
- That count "TWO" of said complaint does not allege that the Defendants willfully and wantonly injured the Plaintiff.

ALICE J. DUCK, CLERK REGISTER

Typus Piper Cook

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CLARA WHITE,

Plaintiff

vs.

JAMES McAFFEE and RANDOLPH L SELLARS,

Defendants

* * * * * * * * * * * * * * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 5077

** * * * * * * * * * * * * * * * * *

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FILED

APR 17 1962

MICE DOWN, CLERK REGISTER

AMENDED COMPLAINT

CLARA WHITE	χ	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
JAMES McAFFEE and RANDOLPH L. SELLARS	X	AT LAW NO
	X	
Defendants	X	

COUNT ONE:

The plaintiff claims of the defendants the sum of Twentyfive Hundred (\$2500.00) Dollars as damages, for that, heretofore, on to-wit, the 15th day of March, 1961, the plaintiff was a passenger in 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 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, a truck-tractor and trailer, he was operating to run over, upon or against the automobile pickup truck in which the plaintiff was then and there a passenger; and plaintiff avers that as a proximate consequence thereof she was injured severely about the body and knees, suffering bruises and contusions; and suffering injuries to her knees and to her body whereby she was disabled and unable to perform her duties as a wife or housekeeper. Said plaintiff was also hospitalized and operated on, all to her damage in the sum aforesaid. And plaintiff avers that all of her said injuries were proximately caused by the said negligence of the said defendant, Randolph L. Sellars, an agent, servant, or employee of the defendant, James McAffee, while acting within the line or 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 Twenty-five Hundred (\$2500.00) Dollars as damages, for that, heretofore, on

to-wit, the 15th day of March, 1961, the plaintiff was a passenger in 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 McAffee, while acting within the line or scope of his employment, with reckless indifference to consequences, wilfully or wantonly ran or caused to be run an automobile truck-tractor and trailer into, upon or against the automobile pickup truck in which plaintiff was riding being conscious at the time that his conduct in so doing would probably result in disaster to plaintiff and by reason thereof and as the proximate result and consequence thereof, plaintiff received personal injuries in this, to-wit: she was injured severely about her body and knees, suffering bruises and contusions; and suffering injuries to her knees and to her body as to be unable to perform her duties as a wife or as a housekeeper. She was hospitalized and operated upon. She suffered and continues to suffer great mental anguish and physical pain; all to her great damage which she avers as aforesaid; hence this suit.

THOMPSON & WHITE

RV.

ttorneys for Plaintiff

Plaintiff respectfully requests trial by jury.

JUN 19 1962 ALICE J. DUCK, REGISTER THOMPSON & THITE

ornevs fo

CLARA WHITE	χ	
Plaintiff	χ	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
JAMES MCAFFEE and RANDOLPH L. SELLARS	X	AT LAW NO. <u>507</u> 7
Defendants	X	
	X	

COUNT ONE:

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THOMPSON & WHITE

By: Attorneys for plainti

Plaintiff respectfully requests trial by jury.

THOMPSON & WHITE

BY:

for plaint

Witness my hand this -

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CIRCUIT COURT, BALDWIN COUNTY

No.____

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TO ANY SHERIFF OF THE STATE OF ALABAMA:

	Tamos Non-free and	Randolph L. Sellars
You Are Hereby Commanded to	Summon James McAffee and	
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parket films from the control of the		
to appear and plead, answer or d	emur, within thirty days from the serv	ice hereof, to the complaint filed in
the Circuit Court of Baldwin Cou	unty, State of Alabama, at Bay Minet	ce, agamse
James McAffee and Ra	andolph L. Sellars	, DefendantS
by <u>Clara White</u>		
	* .	Plaintiff

- Ulul J

Vuell, Clerk

	ot o
	Defendant lives at Rt. 2 Randolph L. Sellars, Rt. Ga.
	sellars,
No	Randolph Georgia Ga
NO	Acwort George IN OFFICE
THE STATE OF ALABAMA	Tames - CRIVID
BALDWIN COUNTY	MAR 14 1982 , 19
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CIRCUIT COURT	M. S. BUTLER, Sheriff, Sheriff
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CLARA WHITE Plaintiffs	this copy with
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RANDOLPH L. SELLARS Defendants	the William of State of The
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