

March 22, 1962

CLARA WHITE, Plaintiff  
VS

RANDOLPH L. SELLARS, et al, Defendants

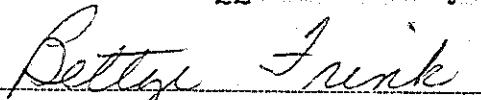
IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA AT LAW

CASE NO. 5077

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, GeorgiaYou 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,  
Defendantsin 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 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 3-20-62WITNESS MY HAND and the Great Seal of the State of Alabama this the 22 day  
of March 1962  
Bettye Frink  
Secretary of StateEnclosures: 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

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 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 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 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 McAfee, 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

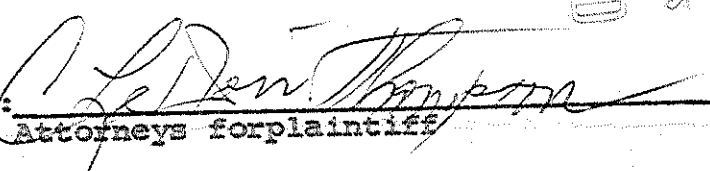
Minette, Baldwin County, Alabama, near the Community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAffee, while acting within the line and scope of his employment, so wilfully and wantonly operated his motor vehicle, to-wit, a truck tractor and trailer, then and there, as to cause said motor vehicle, 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 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 & WHITE

BY:   
Attorneys for plaintiff

plaintiff respectfully requests trial by jury.

THOMPSON & WHITE

BY:   
Attorneys for plaintiff

FILED  
MAY 13 1925  
CLERK

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 Clara White

\_\_\_\_\_, Plaintiff\_\_\_\_

Witness my hand this 13 day of March 1962

Willie J. Duck, Clerk

No. 5072

Page

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

CLARA WHITE

Plaintiffs

vs.

JAMES MCAFFEE

RANDOLPH L. SELLARS

Defendants

SUMMONS and COMPLAINT

FILED

Filed

, 19

MAR 12

CLERK

REGISTER

ALICE J. DUCK,

, Clerk

RECEIVED  
MAR 14 1962  
CLERK OF  
STATE

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

March 22, 1962

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

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA AT LAW

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:

"Registered Mail—  
Return Receipt Requested  
Deliver to Addressee Only"

" James McAfee  
Roswell,  
Ga."

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: CLARA WHITE, Plaintiff VS JAMES McAFFEE, 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 14  
day of March 1962

(Signed) Bettye Frink  
Secretary of State

Enclosure (1)

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 Roswel- Ga.  
on Mar 19 1962

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.

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

X

X

COUNT ONE:

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 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 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 McAfee, while acting within the line and scope of his employment as such agent, servant, or employee in and

CLARA 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 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 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 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 McAfee, 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



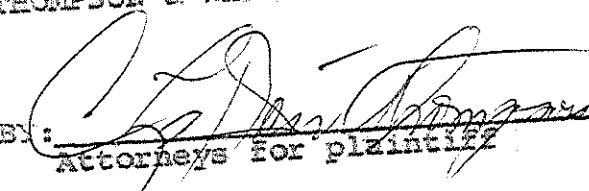
Minette, Baldwin County, Alabama, near the Community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAffee, while acting within the line and scope of his employment, so wilfully and wantonly operated his motor vehicle, to-wit, a truck tractor and trailer, then and there, as to cause said motor vehicle, 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 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

BY:   
Attorneys for plaintiff

plaintiff respectfully requests 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 Clara White

\_\_\_\_\_, Plaintiff

Witness my hand this 13 day of March 1912

Alice J. Duck, Clerk

No. 5077

Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

**CLARA WHITE**

Plaintiffs

vs.

**JAMES McAFFEE**

**RANDOLPH L. SELLARS**

Defendants

**SUMMONS and COMPLAINT**

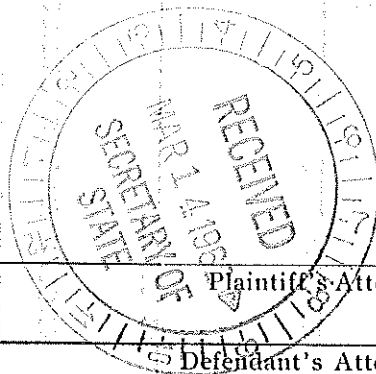
Filed \_\_\_\_\_

, 19 \_\_\_\_\_

**FILED**  
MAR 12 1932

\_\_\_\_\_, Clerk

**ALICE I. 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

CLARA WHITE,	⌘		
	Plaintiff,	⌘	IN THE CIRCUIT COURT OF
vs.	⌘		
		⌘	BALDWIN COUNTY, ALABAMA
JAMES McAFFEE and RANDOLPH	⌘		
L. SELLARS,	⌘	AT LAW	NO. 5077
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.
9. That count "TWO" of said complaint does not allege that the Defendants willfully and wantonly injured the Plaintiff.

*Lynn Piper Cook*

*Gus Stone*  
Attorneys for Defendants

FILED

APR 17 1962

ALICE J. DUCK, CLERK  
REGISTERED  
CLERK

CLARA WHITE,

Plaintiff

vs.

JAMES McAFFEE and RANDOLPH L  
SELLARS,

Defendants

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5077

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

FILED

APR 17 1962

ALICE J. DUCK, CLERK  
REGISTER

AMENDED COMPLAINT

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

COUNT ONE:

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 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 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 McAfee, 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.

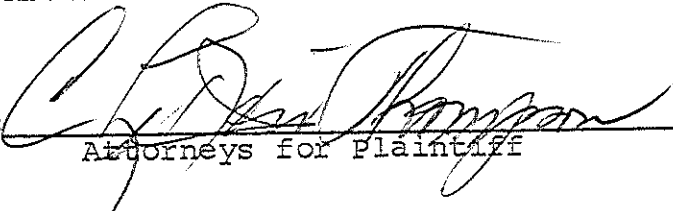
COUNT TWO:

The plaintiff claims of the defendants, the sum of Twenty-five Hundred (\$2500.00) Dollars as damages, for that, heretofore, on

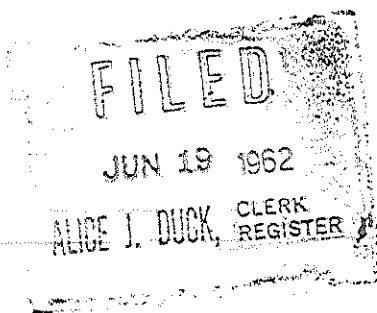
to-wit, the 15th day of March, 1961, the plaintiff was a passenger in an automobile pickup truck, on a public highway, U. S. Highway numbered 31 in Baldwin County, approximately 12 miles East of the City Limits of Bay Minette, Baldwin County, Alabama, near the Community of Perdido, where she had a right to be, and the defendant, Randolph L. Sellars, an agent, servant or employee of the defendant, James McAfee, 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

BY:

  
Attorneys for Plaintiff

Plaintiff respectfully requests trial by jury.



THOMPSON & WHITE

BY:

  
Attorneys for plaintiff

CLARA 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. 5027

COUNT ONE:

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 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 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 McAfee, 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. Sellers, an agent, servant or employee of the defendant, James McAfee, 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, 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 wilfulness and wantonness of the said defendant, Randolph L. Sellers, an agent, servant or employee of the defendant, James McAfee, 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

BY:   
Attorneys for plaintiff

plaintiff respectfully requests 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 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, DefendantS---

by Clara White

\_\_\_\_\_, Plaintiff---

Witness my hand this

13

day of

March

1942

Alice J. Duck, Clerk--

No. 5077

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT

CLARA WHITE

Plaintiffs

vs.

JAMES MCAFFEE

RANDOLPH L. SELLARS  
Defendants

SUMMONS and COMPLAINT

Filed

FILED

MAR 12 1962

ALICE I. DUCK, CLERK  
REGISTER

Plaintiff's Attorney

Defendant's Attorney

467  
Defendant lives at  
Randolph L. Sellars, Rt. 2  
Acworth, Georgia  
James McAffee, Ga.

RECEIVED IN OFFICE

MAR 14 1962

M. S. BUTLER, Sheriff

I have executed this summons

this  
by leaving a copy with

Executed by serving 6 copies of  
the within on Bettyo Trinch  
Secretary of State of The State of  
Alabama.

This the 14 day of March 1962

Sheriff of Montgomery County

M. S. Butler,

By R. S. D. S.

The Sheriff claims 2  
miles at 10c per mile for a total  
of \$ .20

M. S. Butler, Sheriff  
Montgomery County, Ala.

Deputy Sheriff