

5121

June 29, 1962

PHYLISS KAY GALLOWAY, a minor, suing
by Luther B. Galloway, as her father
and next friend, Plaintiff

VS

AMANTA G. WALLACE, et al, Defendants

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

CASE NO. Not Given

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

I, Bettye Frink, Secretary of State, hereby certify that on April 27, 1962
I sent by registered mail in an envelope addressed as follows:

" Amanta G. Wallace
P.O. Box 432
Ocean Springs, Miss."

"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:

" Amanta G. Wallace
P.O. Box 432
Ocean Springs, Miss."

You will take notice that on April 27, 1962 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: PHYLISS KAY GALLOWAY, a minor, suing by Luther B. Galloway, as
her father and next friend, Plaintiff VS AMANTA G. WALLACE, et al,
Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. Not Given 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 27
day of April 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 May 14 1962 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Ocean Springs Miss.
on May 8 1962

WITNESS MY HAND and the Great Seal of the State of Alabama this the 29 day
of June 1962

Bettye Frink
Bettye Frink
Secretary of State

Enclosures: Return Receipt Card and copy
of Summons and Complaint.
cc: Honorable James Ray Owen
Attorney at Law
110 Courthouse Square
Bay Minette, Ala.

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Warren Wallace and Amanta G. Wallace to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Phyliss Kay Galloway, a minor, suing by Luther B. Galloway, as her father and next friend.

WITNESS my hand this 25 day of April, 1962.

Alice J. Luck
Clerk

Defendants' address is
P. O. Box 432, Ocean Springs, Mississippi.

* * * * *

PHYLISS KAY GALLOWAY, a minor,
suing by Luther B. Galloway, as
her father and next friend,

Plaintiff,

VS.

WARREN WALLACE and AMANTA G.
WALLACE,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT

COUNT ONE

The Plaintiff claims of the Defendants the sum of FIVE THOUSAND DOLLARS (\$5,000.00) for that heretofore on to-wit, March 23, 1962, at a point on Baldwin County Highway No. 57, where the said highway intersects Brady Road, in Baldwin County, Alabama, the Defendant, Amanta G. Wallace, who was then and there an agent, servant or employee of the Defendant, Warren Wallace, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated an automobile as to cause it to run into,

upon or against the Plaintiff and as a proximate result of the said negligence the Plaintiff was injured as follows: she was made sick, sore and nervous; she suffered many bruises about her head and body; she suffered severe lacerations of her head, causing numerous stitches to be taken therein, and it was necessary that she spend much time in a hospital in and about the treatment of her said injuries. Plaintiff avers that all of her said injuries were caused as a proximate result of the negligence of the Defendant, Amanta G. Wallace, at said time and place complained of/^{and}that the said Amanta G. Wallace was at said time and place an agent, servant or employee of the Defendant, Warren Wallace, acting within the line and scope of her authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

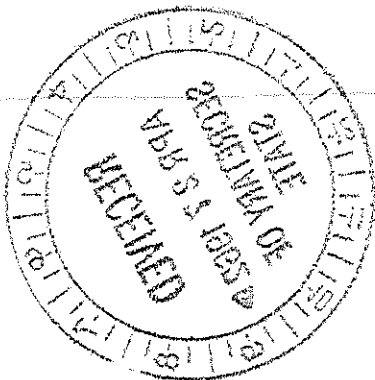
Plaintiff demands a trial by jury of said cause.


Attorney for Plaintiff

FILED

APR 25 1962

ALICE J. DUCK, CLERK
REGISTER



June 29, 1962

PHYLISS KAY GALLOWAY, a minor suing by
Luther B. Galloway, as her father and
next friend, Plaintiff

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA AT LAW

VS

WARREN WALLACE, et al, Defendants

CASE NO. Not Given

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:

April 27, 1962

“

Warren Wallace
P.O. Box 432
Ocean Springs, Miss.”

“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:

“

Warren Wallace
P.O. Box 432
Ocean Springs, Miss.

You will take notice that on April 27, 1962 the Sheriff of Montgomery
County, Alabama, served upon me, in my official capacity, summons and complaint in a
case entitled: PHYLISS KAY GALLOWAY, a minor suing by Luther B. Galloway,
as her father and next friend, Plaintiff VS WARREN WALLACE, et al, Defendants

in the CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW
Case No. Not Given 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 27
day of April 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 May 14, 1962 I received the return card, showing
receipt by the designated addressee of the aforementioned matter at Ocean Springs Miss.
on May 9 1962

WITNESS MY HAND and the Great Seal of the State of Alabama this the 29 day
of June 1962

Bettye Frink
Bettye Frink
Secretary of State

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

cc: Honorable James Ray Owen
Attorney at Law
110 Courthouse Square
Bay Minette, Ala.

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Warren Wallace and Amanta G. Wallace to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Phylliss Kay Galloway, a minor, suing by Luther B. Galloway, as her father and next friend.

WITNESS my hand this 22 day of April, 1962.

Oliver J. Duck
Clerk

Defendants' address is
P. O. Box 432, Ocean Springs, Mississippi

* * * * *

PHYLISS KAY GALLOWAY, a minor,
suing by Luther B. Galloway, as
her father and next friend,
Plaintiff,
VS.
WARREN WALLACE and AMANTA G.
WALLACE,
Defendants.

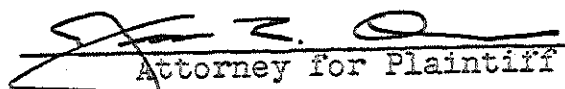
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

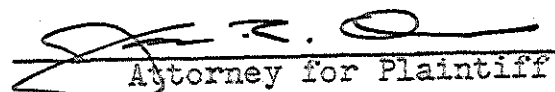
COUNT ONE

The Plaintiff claims of the Defendants the sum of FIVE THOUSAND DOLLARS (\$5,000.00) for that heretofore on to-wit, March 23, 1962, at a point on Baldwin County Highway No. 57, where the said highway intersects Brady Road, in Baldwin County, Alabama, the Defendant, Amanta G. Wallace, who was then and there an agent, servant or employee of the Defendant, Warren Wallace, acting within the line and scope of her authority as such agent, servant or employee so negligently operated an automobile as to cause it to run into,

upon or against the Plaintiff and as a proximate result of the said negligence the Plaintiff was injured as follows: she was made sick, sore and nervous; she suffered many burises about her head and body; she suffered severe lacerations of her head, causing numerous stitches to be taken therein, and it was necessary that she spend much time in a hospital in and about the treatment of her said injuries. Plaintiff avers that all of her said injuries were caused as a proximate result of the negligence of the Defendant, Amanta G. Wallace, at said time and place complained of and that the said Amanta G. Wallace was at said time and place an agent, servant or employee of the Defendant, Warren Wallace, acting within the line and scope of her authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

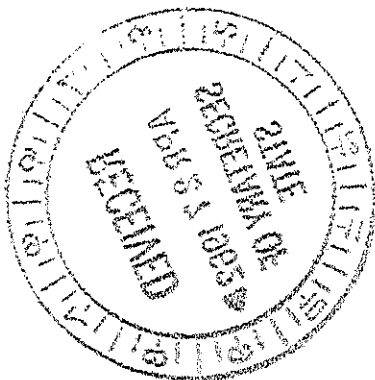
Plaintiff demands a trial by jury of said cause.


Attorney for Plaintiff

FILED

APR 25 1962

ALICE J. DUCK, CLERK
REGISTER



STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Warren Wallace and Amanta G. Wallace to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Phyliss Kay Galloway, a minor, suing by Luther B. Galloway, as her father and next friend.

WITNESS my hand this 25 day of April, 1962.


Clerk

Defendants' address is
P. O. Box 432, Ocean Springs, Mississippi.

Exp-4-27-62

PHYLISS KAY GALLOWAY, a minor,
suing by Luther B. Galloway, as
her father and next friend,

Plaintiff,

VS.

WARREN WALLACE and AMANTA G.
WALLACE,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW


5-12/

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendants the sum of FIVE THOUSAND DOLLARS (\$5,000.00) for that heretofore on to-wit, March 23, 1962, at a point on Baldwin County Highway No. 57, where the said highway intersects Brady Road, in Baldwin County, Alabama, the Defendant, Amanta G. Wallace, who was then and there an agent, servant or employee of the Defendant, Warren Wallace, acting within the line and scope of her authority as such agent, servant or employee, so negligently operated an automobile as to cause it to run into,

upon or against the Plaintiff and as a proximate result of the said negligence the Plaintiff was injured as follows: she was made sick, sore and nervous; she suffered many bruises about her head and body; she suffered severe lacerations of her head, causing numerous stitches to be taken therein, and it was necessary that she spend much time in a hospital in and about the treatment of her said injuries. Plaintiff avers that all of her said injuries were caused as a proximate result of the negligence of the Defendant, Amanta G. Wallace, at said time and place complained of/^{and}that the said Amanta G. Wallace was at said time and place an agent, servant or employee of the Defendant, Warren Wallace, acting within the line and scope of her authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial by jury of said cause.


Attorney for Plaintiff

FILED

APR 25 1962

ALICE J. DUCK, CLERK
REGISTER

PHYLISS KAY GALLOWAY, a minor,
suing by Luther B. Galloway, as
her father and next friend,

Plaintiff,

VS.

WARREN WALLACE and AMANTA G.
WALLACE,

Defendants.

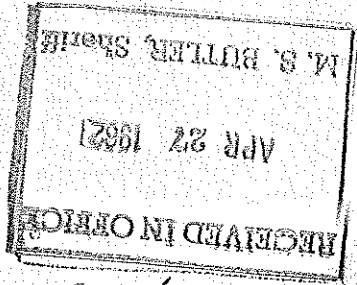
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

FILED

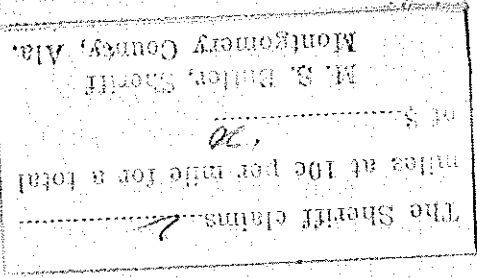
APR 25 1962

ALICE J. DUCK, CLERK
REGISTERED

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA



Executed by serving *Le...* copies of
the within on *Baldwin County*
Secretary of State of The State of
Alabama.
This the *27th* day of *April* 19*62*
Sheriff of Montgomery County
M. S. Butler,
By *James R. Owen*, D. S.



PHYLLISS KAY CALLOWAY, A MINOR VS AMANTA G.
WALLACE, et al

1- INSTRUCTIONS TO DELIVERING EMPLOYEE

☒ Deliver *ONLY* to
addressee

☐ Show address where
delivered

(Additional charges required for these services)

Not Given

RETURN RECEIPT

Received the numbered article described on other side.

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

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED

ADDRESS WHERE DELIVERED (only if requested in item #1)

MAY 8 1962

CBS-16-71548-4 GPO

PHYLLISS KAY CALLOWAY, A MINOR VS WARREN WALLACE

1- INSTRUCTIONS TO DELIVERING EMPLOYEE

☒ Deliver *ONLY* to
addressee

☐ Show address where
delivered

(Additional charges required for these services)

ETAL

Not Given

RETURN RECEIPT

Received the numbered article described on other side.

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

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DELIVER TO ADDRESSEE ONLY

DATE DELIVERED

ADDRESS WHERE DELIVERED (only if requested in item #1)

MAY 9 1962

CBS-18-71648-4 GPO

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE \$300

<p>INSTRUCTIONS: Fill in items below and place #1 on other side when applicable. Gummed ends and attach to back of article. Print on front of article. RETURN RECEIPT REQUEST</p>	
REGISTERED NO. 55264	NAME OF SENDER SECRETARY OF STATE
CERTIFIED NO.	STREET AND NO. OR P.O. NO. MONTGOMERY, ALABAMA
INSURED NO. 1	CITY, ZONE AND STATE MONTGOMERY, ALABAMA

CS-4 (6-7-54) 7-1

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE \$300

<p>INSTRUCTIONS: Fill in items below and place #1 on other side when applicable. Gummed ends and attach to back of article. Print on front of article. RETURN RECEIPT REQUEST</p>	
REGISTERED NO. 55265	NAME OF SENDER SECRETARY OF STATE
CERTIFIED NO.	STREET AND NO. OR P.O. NO. MONTGOMERY, ALABAMA
INSURED NO.	CITY, ZONE AND STATE MONTGOMERY, ALABAMA

CS-4 (6-7-54) 7-1