2840-89517

STATEMENT OF ACCOUNT

#9970

Creditor Dr. G. L. Wallace

Debtor Hugh Quinn Address 107 Hickory St. Bay Minette, Ala.

Employment Bay Slacks Address Hoyle Ave. Bay Minette, Ala.

Professional Services Rendered On Account $ 51.00

Merchandise, Goods, Sold and Delivered On Account $

Date of Last Charge 10-20-67

Date of Last Payment 10-20-67

SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X Dr. G. L. Wallace

Affiant

Sworn and subscribed to before me this

24 day of September 19 70

Notary Public

My Commission Expires December 16, 1972

For value received, I (We) hereby transfer, sell, assign and set over unto Mobile Adjustment Service, Inc., all my (our) right, title and interest in and to the above claim.

X Dr. G. L. Wallace

1015-89517

STATEMENT OF ACCOUNT

Creditor Suburban Hospital

Debtor Hugh Quinn Address 107 Hickory St., Bay Minette, Ala.

Employment Bay Slacks Address Hoyle Ave. Bay Minette, Ala.

Professional Services Rendered On Account $ 73.05

Merchandise, Goods, Sold and Delivered On Account $

Date of Last Charge 10/8/67

Date of Last Payment 10/21/67

SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X Mrs Bettye Daniels
Suburban Hospital
Affiant

Sworn and subscribed to before me this

21st day of September 19 70.

Mrs Lucille H. Reynolds
Notary Public

My Commission Expires 10/28/73

For value received, I (We) hereby transfer, sell, assign and set over unto Mobile Adjustment Service, Inc., all my (our) right, title and interest in and to the above claim.

X Mrs. Bettye Daniels
Suburban Hospital

16-1-35M-5-70

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS
COURTROOM "B" FIRST FLOOR

The State of Alabama,
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Hugh Quinn

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 4 day of Nov, 19 70 at the hour of 9:00 A.M., then and there to answer a complaint of Mobile Adjustment Service, Inc.

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this ..... day of ....., 19.....

OCT 5 1970

Clerk of the Court of General Sessions of Mobile County.

Cause of Action Plaintiff claim of Defendant $ 124.05 due from him by account on 10-20-67, which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial.

COURT OF GENERAL SESSION
OCT 2 9 35 AM '70

ATTORNEY FOR PLAINTIFF

COMPLAINT AND SUMMONS

Atty. for Plaintiff: GIBBONS & STOKES

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 90710

Ret. Nov 4, 1970

Mobile Adjustment Service, Inc.,
VS. Plaintiff

Hugh Quinn, Defendant

Continued To

107 Hickory Street
Bay Minette, Alabama

Executed by Service on

Defendant

This ..... day ....., 19.....

Sheriff of Mobile County

By .....
Deputy Sheriff

16-1-15M-5-70

COMPLAINT AND SUMMONS

REPORT TO GENERAL SESSIONS
COURTROOM "B" FIRST FLOOR

The State of Alabama,
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Hugh Quinn

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 2 day of Nov Dec, 1970 at the hour of 9:00 A.M., then and there to answer a complaint of Mobile Adjustment Service, Inc.

of a debt or other demand not exceeding Seven Hundred Fifty Dollars.

Herein fail not and have you then and there this precept with your doings.

Witness my hand, this day of OCT 5, 1970

Clerk of the Court of General Sessions of Mobile County.

Cause of Action Plaintiff claim of Defendant $ 124.05
10-26-67
due from him by account on , which sum of money with the interest thereon, is still unpaid. This suit is filed on an itemized verified account, which will be offered in evidence at trial

ATTORNEY FOR PLAINTIFF

COMPLAINT AND SUMMONS

Atty. for Plaintiff: GIBBONS & STOKES

Atty. for Defendant:

THE COURT OF GENERAL SESSIONS
OF MOBILE COUNTY

No. 90710

Ret. Dec 2
Nov 4, 1970

Mobile Adjustment Service, Inc.,
VS. Plaintiff

Hugh Quinn, Defendant

Continued To

107 Hickory Street
Bay Minette, Alabama

RECEIVED

NOV 19 1970

TAYLOR WILKINS
SHERIFF

Executed by Service on

Hugh Quinn
Defendant

This 1 day Dec, 1970

Sheriff of Mobile County

By W.A. Tolbert
Deputy Sheriff

REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.
NOV 5 11 15 AM '70
BY

REC'D SHERIFF
MOBILE COUNTY,
DEC 3 8 49
BY

Sheriff claims _____ miles at
Ten Cents per mile Total $_____
TAYLOR WILKINS, Sheriff
BY _____
DEPUTY SHERIFF

90710

WILSON HAYES
LAWYER
P. O. BOX 300
BAY MINETTE, ALABAMA
36507
TELEPHONE 937-5506

December 8, 1970

Clerk, Court of General
Sessions of Mobile County
Mobile, Alabama 36602

Re: Mobile Adjustment Service, Inc.
Vs. Hugh Quinn, Case #90710

Dear Sir:

Enclosed is a Plea in Abatement in the above stated cause.

With kind regards, I am

Yours very truly,

Wilson Hayes

WH/ms
Enc.

MOBILE ADJUSTMENT SERVICE, INC.,	)	IN THE COURT OF GENERAL SESSION
Plaintiff,	)	MOBILE COUNTY, ALABAMA
Vs.	)	AT LAW
HUGH QUINN,	)	
Defendant.	)	NUMBER: 90710

PLEA IN ABATEMENT

Comes now the Defendant in the above styled cause by his Attorney, Wilson Hayes, and makes his appearance in this cause specially and only for the purpose of making the following plea:

1. Plaintiff ought not to have and maintain the above styled cause for that Defendant is now and was at the time of the filing of this cause a resident citizen of Baldwin County, Alabama.

2. Plaintiff ought not to have and maintain his suit in this cause for that Defendant is not now and never has been a resident of Mobile County, Alabama.

3. Plaintiff ought not to have and maintain his suit in the above styled cause for that Defendant resides in and has always resided in the town of Bay Minette, Baldwin County, Alabama and that Plaintiff well knows this fact, that the said address given for service is Defendant's address in Baldwin County, Alabama.

Wilson Hayes
Attorney for Defendant

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Wilson Hayes, who being known to me and being duly sworn deposes and says that he has read the foregoing plea and knows the facts therein are true to the best of his information and belief.

Wilson Hayes

Sworn to and subscribed before me this 8th day of December, 1970.

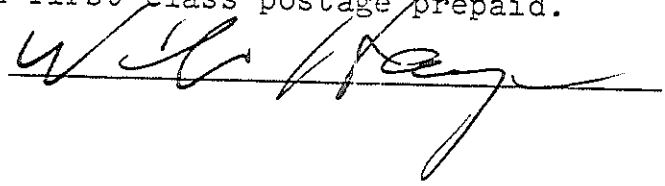
COURT OF GENERAL SESSION
DEC 10 11 27 AM '70

Mary C. Stirs
Notary Public

My Commission Expires [illegible]

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 8th day of December, 1970, served a copy of the foregoing pleading on counsel for all Parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.



GIBBONS & STOKES
ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
BEN STOKES
ROBERT F. CLARK
JOHN T. BALLARD

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA 36601

July 19, 1971

Mr. J. D. Richardson, Clerk
Court of General Sessions
Mobile County Courthouse
Mobile, Alabama

Re: Mobile Adjustment Service, Inc. vs. Hugh Quinn,
Case No. 90,710

Dear Sir:

Many months ago we confessed the plea in abatement and we thought the case had been transferred to Baldwin County. Please cause an order to be entered transferring the case to Baldwin County, Circuit Court.

Sincerely yours,

Ben Stokes

BS:mi

90 70

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 90710

MOBILE ADJUSTMENT SERVICE, INC.	Filed:	October 2, 1970
Plaintiff	Summons Issued:	October 5, 1970
VS	Returnable:	November 4, 1970
HUGH QUINN	Service Had:	December 1, 1970
Defendant	Cause of Action:	IVA
	Attorney for Plaintiff:	Gibbons & Stokes
	Attorney for Defendant:	W. Hayes
	Amount of Claim:	$124.05

12/2/70 - for return

1/13/71 - for return

12/10/70 - Defendant's plea in abatement filed

2/10/71 - Plea Granted
Paul W. Brunson Paul W Brunson

7/28/71 - F/D

7/28/71 - Cause Transferred to Baldwin County Circuit Court

Paul W Brunson

I hereby certify that the foregoing is a true and correct copy of the above styled cause, as it appears on record and in the files of The Court of General Sessions of Mobile County, Alabama

Witness my hand this the 28 day of July, 1971.

J D Richardson
Clerk of the Court of General
Sessions of Mobile County, Alabama.

B6—5M—4-71

COST BILL

Gibbons & Stokes
ATTORNEYS FOR PLTF:—

General Sessions (Civil Div.) Court of Mobile, Mobile County Court House, Mobile, Ala.

Mobile Adjustment Service
Plaintiff

Hugh Denson
Defendant

CASE NO. 90710

Garnishee

COURT FEES

Summons and proceedings thereon to judgment	$1.00
Docketing each cause	.10
Law Library Fee	1.00
Garnishment	
TOTAL	$

SHERIFF'S FEES

Levying Attachment	6.00
Entering and returning same	.25
Summoning Garnishee and making return	1.50
Serving Summons and other mesne process, and returning the same	1.50
Collecting execution for costs only	1.50
Serving any summons not herein provided for, and making return	1.50
TOTAL	$
GRAND TOTAL	$ 6 35

I respectfully call your attention to the above Court Cost Bill which if not paid by_____, 19_____, it will be my unpleasant duty to issue execution on your property for the recovery of the same.

J. D. Richardson, Clerk

Grif B-11—1M—5-69

NOTICE of ~~APPEAL~~ TRANSFER

STATE OF ALABAMA,
MOBILE COUNTY

Mobile Adjustment Service, Inc.

Plaintiff

VS.

Hugh Quinn

Defendant

To Hugh Quinn

in said Cause:

You are hereby notified that Mobile Adjustment Service, Inc.

the Plaintiff in the above entitled cause has prayed and obtained ~~an appeal from the judgement therein rendered by~~ a transfer to the Circuit Court of Baldwin County, Alabama, ~~the~~ from the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Mobile County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 28 day of July 19 71

J. D. Richardson

Clerk, Court of General Sessions of Mobile County, Civil Division

9970

Case No. 90710

Mobile Adjustment Service, Inc.

Plaintiff,

VS

Hugh Quinn

107 Hickory Street
Bay Minette, Alabama
Defendant.

NOTICE OF Transfer

Returnable To The Circuit Court of

Baldwin County

Issued: July 28, 1971

Serve On:

Hugh Quinn
107 Hickory Street
Bay Minette, Alabama

Grif B-11—1M—5-69

TRANSFER

NOTICE of ~~APPEAL~~

STATE OF ALABAMA,
MOBILE COUNTY

Mobile Adjustment Service, Inc.

Plaintiff

VS.

Hugh Quinn

Defendant

To Hugh Quinn

in said Cause:

You are hereby notified that Mobile Adjustment Service, In

the Plaintiff in the above entitled cause has prayed and obtained ~~an appeal from the judgement therein rendered by~~ a transfer to the Circuit Court of Baldwin County, Alabama, ~~Judge of the~~ from the COURT OF GENERAL SESSIONS OF MOBILE COUNTY, and having complied with the requirements of the law in such cases made and provided, the same has been granted to the next term of the CIRCUIT COURT of Mobile County, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 28 day of July 19 71

J. D. Richardson

Clerk, Court of General Sessions of Mobile County, Civil Division

Mail Cr 9970

Case No. 90710

Mobile Adjustment Service, Inc.

Plaintiff,

VS

Hugh Quinn

107 Hickory Street
Bay Minette, Alabama
Defendant.

NOTICE OF ~~APPEAL~~ Transfer

AUG 3 1971

Returnable To The Circuit Court of

Baldwin County

SHERIFF

Issued: July 28, 1971

Serve On:

Hugh Quinn 8/10 Bold Cr
107 Hickory Street
Bay Minette, Alabama

over

RECD SHERIFF DEPT. MOBILE COUNTY, ALA.
JUL 30 4 26 PM '71
BY

RECD SHERIFF DEPT MOBILE COUNTY, ALA
AUG 12 1 31 PM '7
BY

Received 3 day of August 19 71
and on 10 day of Aug 19 71 TAYLOR WILKINS, SHERIFF OF BALDWIN COUNTY, ALABAMA, CLAIM $1.50 EACH
I served a copy of the within Not. of Transfer
on Hugh Quinn FOR SERVING 1 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF $ 0
PROCESS(ES) OR A TOTAL OF $ 1.50
By service on

TAYLOR WILKINS, Sheriff
By D G Fallin D. S.

GIBBONS & STOKES
ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
BEN STOKES
ROBERT F. CLARK
JOHN T. BALLARD

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA 36601

February 7, 1972

Mrs. Eunice Blackmon
Clerk, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Mobile Adjustment Service
vs Hugh Quinn
Case No. ? 9970

Dear Mrs. Blackmon:

Please nonsuit the above styled matter.

Sincerely,

Robert F. Clark

Robert F. Clark

RFC:cm

Hold
No case
yet

WILSON HAYES
LAWYER
P. O. BOX 300
BAY MINETTE, ALABAMA
36507
TELEPHONE 937-5506

9970

March 27, 1971

Mrs. Eunice Blackmon, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama 36507

Re: Mobile Adjustment Service, Inc.
Vs. Hugh Quinn

Dear Eunice:

Please file the enclosed Jury demand in the above noted case.

With kind regards, I am

Yours very truly,

Wilson Hayes

WH/ms
Enc.

MOBILE ADJUSTMENT SERVICE, INC.,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
Vs.	)	AT LAW
HUGH QUINN,	)	
Defendant.	)	NUMBER: _____

Comes now Defendant in the above styled cause and demands trial by jury.

Wilson Hayes

Attorney for Defendant
Wilson Hayes
P. O. Box 300
Bay Minette, Alabama 36507

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 27th day of MARCH, 1971, served a copy of the foregoing pleading on counsel for all Parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

Wilson Hayes

FILED

MAR 29 1971

EUNICE B. BLACKMON CIRCUIT CLERK

WILSON HAYES
LAWYER
P. O. BOX 300
BAY MINETTE, ALABAMA
36507

TELEPHONE 937-5506

March 27, 1971

Mrs. Eunice Blackmon, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama 36507

Re: Mobile Adjustment Service, Inc.
Vs. Hugh Quinn

Dear Eunice:

Please file the enclosed motion to quash service in the above noted case.

With kind regards, I am

Yours very truly,

Wilson Hayes

WH/ms
Enc.

MOBILE ADJUSTMENT SERVICE, INC.,	ß	IN THE CIRCUIT COURT OF
Plaintiff,	ß	BALDWIN COUNTY, ALABAMA
Vs.	ß	AT LAW
HUGH QUINN,	ß	
Defendant.	ß	NUMBER: _____

Comes now Defendant in the above styled cause and appears specially and only for the purpose of filing the within contained motion and moves the Court to quash the service in this cause and assigns as grounds the following:

1. It affirmatively appears that valid service was not had on Defendant.

2. It affirmatively appears from the record that there has been no valid service made on Defendant.

Respectfully moved.

Attorney for Defendant
Wilson Hayes
P. O. Box 300
Bay Minette, Alabama 36507

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 29th day of March, 1971, served a copy of the foregoing pleading on counsel for all Parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

FILED

MAR 29 1971

EUNICE B. BLACKMON CIRCUIT CLERK