

FRIENDLY FINANCE SERVICE, INC.,
a corporation

Plaintiff

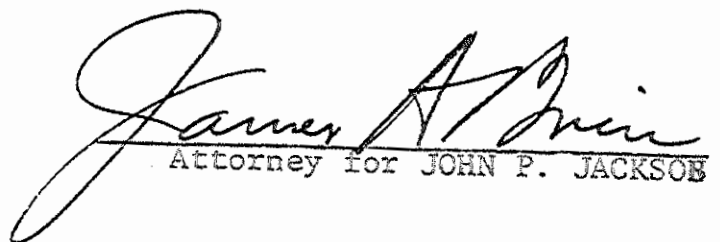
vs.

GABRIEL W. DENHAM and JOHN P.
JACKSON, jointly and
individually
Defendants

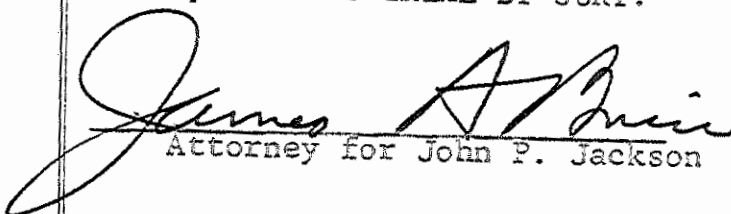
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, No. 5419

Comes the defendant, John P. Jackson,
by his attorney, and demurs to the complaint heretofore filed
in this cause insofar as it affects him in any manner, and for
grounds therefor, says:

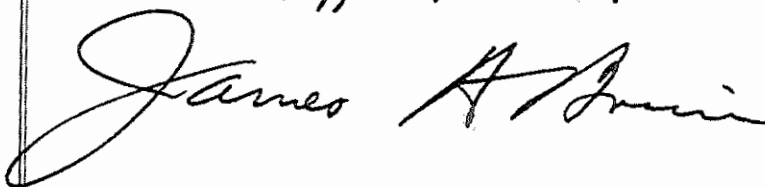
1. There is a misjoinder of parties.
2. Complaint fails to state a cause of action.
3. Complaint fails to show what part, if any, of said
note is interest.


Attorney for JOHN P. JACKSON

Please take note that defendant John P. Jackson
hereby demands TRIAL BY JURY.


Attorney for John P. Jackson

Copy to J. Connor Owens
mailed this 31ST day of
January, 1963.



FILED

FEB 1 63

ALICE I. DUCK, CLERK
REGISTER

FRIENDLY FINANCE SERVICE,
INC., a Corporation,

Plaintiff,

vs.

GABRIEL W. DENHAM and JOHN
P. JACKSON, jointly and
individually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW

NO. _____.

The Plaintiff claims of the Defendants the sum of \$423.22, the balance due upon a note executed by the Defendants on the 15th day of August, 1962, in the sum of \$461.58, and payable to Top Motor Exchange, Inc. in 12 monthly installments of \$38.46 each, the first installment to become due September 17th, 1962, which note was before maturity, on to-wit: the 20th day of August, 1962, assigned to the Plaintiff and which note is due and unpaid.

Assignee further alleges that in and by the terms of said note, failure to pay said note or any of the installments thereon when due, matured all of said installments then unpaid.

Plaintiff further alleges that in and by the terms of said note, that the Defendants waived all rights of exemption under the Constitution and the Laws of the State of Alabama, and the Plaintiff claims the benefit of said waiver.

Plaintiff further alleges that in and by the terms of said note, that should an attorney be employed to collect or attempt to collect said note, then the parties Defendant agreed to pay a reasonable attorney's fee, and the Plaintiff claims the further and additional sum of \$65.00 as a reasonable attorney's fee in the premises.

James Owens, Jr.
Attorney for the Plaintiff

FILED

JAN 2 63

Alice I. Duck, Clerk
Baldwin County, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

DECEMBER

TERM, 1962

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Gabriel W. Denham and John P. Jackson

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 Gabriel W. Denham
and John P. Jackson, jointly and individually, Defendant S

by Friendly Finance Service, Inc., a Corporation

Plaintiff

Witness my hand this 2 day of January 19 62

Exp-1-5-62

Allice J. Hirsch, Clerk

Gabriel W. Denham resides at Route 2, Foley, Alabama.
John P. Jackson resides at Gulf Shores, Alabama

No. 5419

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

FRIENDLY FINANCE SERVICE, INC.,
a Corporation,

Plaintiffs//

vs.

GABRIEL W. DENHAM and JOHN P.

JACKSON, jointly and individually,
Defendants

SUMMONS and COMPLAINT

Filed

FILED

, 19

JAN

63

, Clerk

ALICE I. DUCK, CLERK
REGISTER

J. Connor Owens, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

Jan. 2, 1963

, Sheriff

I have executed this summons
this Jan 2, 1963
by leaving a copy with

John Jackson
Gabriel Denham

Sheriff claims 20.0 miles at

Ten Cents per mile Total \$ 20.00
TAYLOR WILKINS, Sheriff

BY

CC
DEPUTY SHERIFF

Sheriff

Deputy Sheriff