

COMMERCIAL CREDIT EQUIPMENT CORPORATION,
PLAINTIFF
VS
FRED H. STICKNEY,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

4918

I

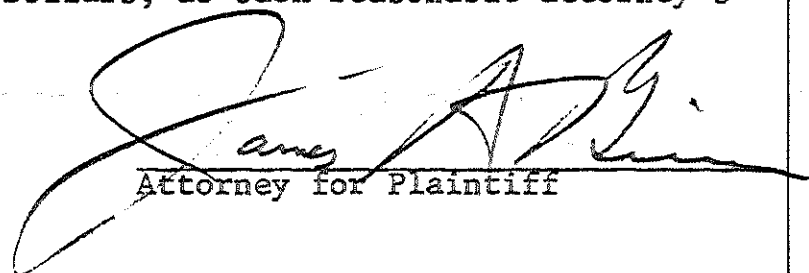
The plaintiff claims of the defendant the sum of Four Hundred Four and 42/100 (\$404.42) Dollars, due by promissory note made by the defendant on the 21st day of April 1959, which sum of money, with interest thereon, is still unpaid.

II

The plaintiff claims of the defendant the sum of Four Hundred Four and 42/100 (\$04.42) Dollars, due by promissory note made by the defendant on the 21st day of April 1959, and payable on the 1st day of May 1961, with interest from May 1, 1961.

Plaintiff avers that in and by the terms of said note the defendant waived all right to exemption under the constitution and laws of the State of Alabama, and of this waiver plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the plaintiff further claims of the defendant the further and additional sum of One Hundred Thirty-Five and NO/100 (\$135.00) Dollars, as such reasonable attorney's fee.


Attorney for Plaintiff

FILED
OCT 19 1961
ALICE L. DICK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

Fred H. Stickney

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 _____

Fred H. Stickney

_____, Defendant_____

by _____

Commercial Credit Equipment Corporation

_____, Plaintiff_____

Witness my hand this _____

18

day of _____

Oct

1961

64-3-17-62

Alice J. Duck

_____, Clerk

288 Dexter Ave Mobile
3018
No. 4918 Page 3067

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Commercial Credit Equip-

ment Corporation

Plaintiffs

vs.

Fred H. Stickney

251 36 Louis St.
Mobile, Ala.

Defendants

Summons and Complaint

Filed

FILED

19

OCT 19 1961

Clerk

**ALICE J. DUCK, CLERK
REGISTER**

RECEIVED

DEC 18 1961

**SHERIFF'S OFFICE
James A. Brice**

Plaintiff's Attorney

Defendant's Attorney

RECEIVED

JAN 26 1962

SHERIFF'S OFFICE

Received In Office

10/17/61, 19

Sheriff.

I have executed this summons

this 19

by leaving a copy with

Returned 25 day of Oct 1961
Not found in my county after diligent search and in
quiry.

Taylor Wilkins, Sheriff

EXECUTED

This 17 day of Mar, 1962

by serving a copy of the writ on

Fred H. Stickney
RAY D. BRIDGES, CLERK

By Villar D.S.

Sheriff.

Deputy Sheriff.

COMMERCIAL CREDIT EQUIPMENT
CORPORATION,

Plaintiff

VS

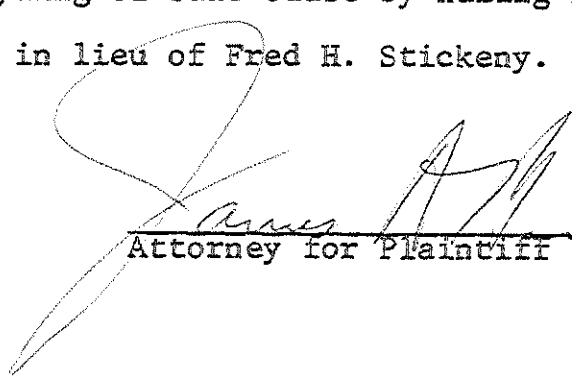
FRED H. STICKNEY,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, NO. 4918

AMENDMENT

469
Comes now the Plaintiff in the above styled cause, by its
Attorney, and amends the styling of said cause by naming Fred G.
Stickney as party defendant in lieu of Fred H. Stickney.


Attorney for Plaintiff

FILED

JAN 21 1962

ALICE J. DUCK, CLERK
REGISTER

COMMERCIAL CREDIT EQUIPMENT
CORPORATION,

Plaintiff,

VS.

FRED G. STICKNEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4918

PLEA IN ABATEMENT

Now comes the Defendant and files this his special plea to the jurisdiction of this Court in the above styled cause to the complaint filed against him by the Plaintiff on to-wit, October 19, 1961, and says that the Plaintiff cannot maintain said cause against him in this court and the Defendant enters this plea in said cause, for the sole and only purpose of pleading to the jurisdiction of this court and says:

1. That the Defendant is a resident citizen of Mobile County, Alabama, and that Mobile County, Alabama, is the permanent residence of the said Defendant and that the note and instrument of writing sued on in this cause was made in Covington County, Alabama, and the said Defendant avers that he did not execute said instrument or note in writing sued on in this cause in Baldwin County, Alabama.

Fred G. Stickney

STATE OF ALABAMA)

*

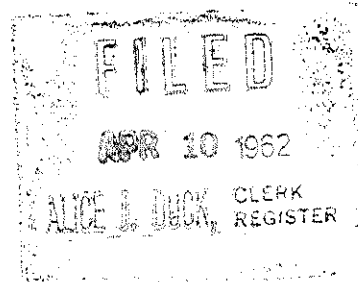
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said State and County personally appeared Fred G. Stickney, who first being duly and legally sworn says, that he has read over the foregoing plea in abatement and that the matters set forth therein are true.

Fred G. Stickney

Sworn to and subscribed before me
on this the 10th day of April, 1962.

[Signature]
Notary Public, Baldwin County, Alabama.



JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

December 14, 1961

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Commercial Credit Equipment Corp.
Vs: Fred H. Stickney
Case No. 4918

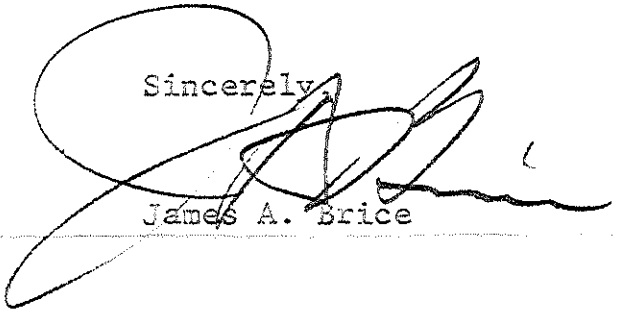
Dear Mrs. Duck:

Mr. Stickney lives on Church Street in Mobile. He works for Central Electric Company, 251 St. Louis Street, Mobile.

Kindly send summons and complaint to the Mobile County Sheriff for service there.

Thank you.

Sincerely,



James A. Brice

JAB:j

cc: N. Wayne Garrett
Comm. Credit Equip. Corp.
Cross Country Plaza, Room 240
Columbus, Georgia