

THE AMERICAN NATIONAL BANK  
AND TRUST COMPANY OF MOBILE,  
A National Banking Association,  
Plaintiff,  
Vs.  
NORMA S. HARTNESS,  
Defendant.

IN THE  
COURT OF GENERAL SESSIONS  
OF MOBILE COUNTY, ALABAMA  
CASE NO. 5540

COUNT ONE.

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED AND NO/100 DOLLARS (\$500.00), the balance due on a promissory note, made by the Defendant on, to-wit, July 26, 1961, and payable in thirty (30) installments beginning on, to-wit, August 25, 1961. Plaintiff further alleges that in said note, as a part of the consideration thereof, the Defendant agreed that in the event of default in the payment of any one of said installments when due, the holder of said note shall have the right to declare the entire indebtedness immediately due and payable, and the Plaintiff alleges that there has been a default in the payment of said installments, and the Plaintiff has elected to declare the entire indebtedness due and payable.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By Lerrill G. Rhee  
Attorneys for Plaintiff

The Defendant may be served at:

P. O. Box 35  
Perdido, Alabama

FILED

APR 11 1963

ALICE J. DUCK, CLERK  
REGISTER

## COMPLAINT AND SUMMONS

1-A

The State of Alabama, }  
MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

You are hereby commanded to summon Norma S. Hartness

to be and appear before the Court of General Sessions of Mobile County at the Courthouse of Mobile County, on the 9 day of April, 1963 at the hour of 9:30 A. M., then and there to answer a complaint of The American National Bank & Trust Co. of  
Mobile, a national banking association

of a debt or other demand not exceeding Five Hundred Dollars.

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

Witness my hand, this 1 day of Mar., 1963.

G. V. Adams  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action \_\_\_\_\_

# COMPLAINT AND SUMMONS

Atty. for Plaintiff: Hamilton, Denniston, Butler & Riddick

Atty. for Defendant:

## THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

No. 27612

Ret.

April 9, 1963

The American National Bank & Trust Co.  
of Mobile, a national banking association  
VS.

Norma S. Hartness  
P. O. Box 35  
Perdido, Ala.

Continued To

Executed by Service on

Defendant

This day, 19

Sheriff of Mobile County

By Deputy Sheriff

## COMPLAINT AND SUMMONS

1-A

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MOBILE COUNTY

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G. V. Adams  
Clerk of the Court of General Sessions of Mobile County.

Cause of Action

## COMPLAINT AND SUMMONS

2

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MOBILE COUNTY

TO THE SHERIFF OF MOBILE COUNTY—GREETINGS:

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Witness my hand, this 1 day of Mar., 1963.

G. V. Adams Jr.

Clerk of the Court of General Sessions of Mobile County.

Cause of Action

THE AMERICAN NATIONAL BANK  
& TRUST CO. of MOBILE, a  
national banking association

IN THE COURT OF GENERAL SESSIONS  
MOBILE COUNTY, ALABAMA

Plaintiff

CASE NO. 27612

VS

NORMA S. HARTNESS

Defendant

..-.-.-..

Comes now the Defendant in the above styled cause by her attorney, WILSON HAYES, and makes her appearance in this cause specially and only for the purpose of making the following plea:

I

Plaintiff ought not to have and maintain the above styled cause for that Defendant is now and always has been a resident of Baldwin County, Alabama.

II

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

III

Plaintiff ought not to have and maintain its suit in the above styled cause for that Defendant resides in and has always resided in Perdido, Baldwin County, Alabama.

Wilson Hayes  
ATTORNEY FOR DEFENDANT

Norma S. Hartness  
DEFENDANT

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, Wilson Hayes, a Notary Public in and for said State of Alabama at Large, personally appeared Norma S. Hartness the Defendant in the above styled cause who, being known to me and being duly sworn deposes and says.

I have read the foregoing plea in its entirety and know it to be true and with out error.

Norma S. Hartness

Sworn to and subscribed before me on this the 27th day of March, 1963.

Wilson Hayes  
Notary Public, State of Ala. at Large

THE AMERICAN NATIONAL BANK  
& TRUST CO. OF MOBILE, a  
national banking association

Plaintiff

vs.

NORMA S. HARTNESS

Defendant

4  
IN THE COURT OF GENERAL  
SESSIONS

MOBILE COUNTY, ALABAMA

CASE NO. 27,612

MOTION

Comes now the Plaintiff in the above styled cause by and through its attorney and admits the Plea in Abatement heretofore filed herein and moves this Honorable Court to transfer this case to the appropriate Court in Baldwin County, Alabama, as is provided for in Act No. 76, Special Session 1961, as approved September 15, 1961, and found in Acts of Alabama, 1961, Volume II, Page 1953.

HAMILTON, DENNISTON, BUTLER & RIDDICK

By

Lerrill H. Pike  
Attorneys for Plaintiff

THE COURT OF GENERAL SESSIONS OF MOBILE COUNTY

Case No. 27612

THE AMERICAN NATIONAL BANK &	:	Filed:	February 28, 1963
TRUST COMPANY OF MOBILE, a	:		
National Banking Association,	:	Summons Issued:	March 1, 1963
	:		
Plaintiff,	:	Returnable:	April 9, 1963
	:		
VS	:	Service Had:	March 8, 1963
	:		
	:	Cause of Action:	Complaint and Summons
	:		
NORMA S. HARTNESS,	:	Attorneys for Plaintiff:	Hamilton, Denniston,
	:		Butler & Riddick
Defendant.	:		
Amount of Claim: \$500.00	:	Attorney for Defendant:	Wilson Hays

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Plea in Abatement Filed - March 28, 1963

Plaintiff's Motion to Transfer to Baldwin County Filed - April 9, 1963

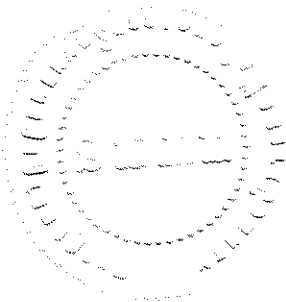
April 9, 1963 - Motion granted to transfer to Baldwin County - W. L. Finch

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 9th day of April, 1963.



Clerk of The Court of General Sessions of Mobile County







TRANSFER

**NOTICE of ~~APPEAL~~**STATE OF ALABAMA, }  
MOBILE COUNTY }THE AMERICAN NATIONAL BANK & TRUSTCOMPANY OF MOBILE, a national banking  
association Plaintiff

VS.

NORMA S. HARTNESS


Defendant

To NORMA S. HARTNESS, the defendant

in said Cause:

You are hereby notified that THE AMERICAN NATIONAL BANK & TRUST COMPANY  
OF MOBILE, a national banking association

the plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama,  
~~an appeal from the judgment therein rendered by~~  
 from the Judge of 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 Baldwin County  
~~Mobile County,~~ to be held for said County, you are hereby notified accordingly.

Given under my hand this the 9 day of April 1963
  
 Clerk, Court of General Sessions of Mobile County, Civil Division

Case No. 27612

5340

Received 11 day of April 1963  
and on 18 day of April 1963  
served a copy of the within Notice of  
Norma Hartness transfer

By service on \_\_\_\_\_

THE AMERICAN NATIONAL BANK & TRUST COMPANY  
OF MOBILE, a national Banking Association

Plaintiff,

VS

NORMA S. HARTNESS

Defendant.

NOTICE OF ~~APPEAL~~ TRANSFER

Returnable To The Circuit Court of  
Baldwin County

Issued: April 9th, 1963

Serve On: Norma S. Hartness  
P. O. Box 35  
Perdido, Alabama

TAYLOR WILKINS, Sheriff

By W. A. Talbot D. S.

Perdido  
APR 10 1963

RECEIVED  
SHERIFF'S OFFICE

APR 22 1963

SHERIFF'S OFFICE

Sheriff claims 26 miles at

Ten Cents per mile Total \$ 2.60

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

THE AMERICAN NATIONAL BANK  
AND TRUST COMPANY OF MOBILE

PLAINTIFF

VS

NORMA HARTNESS

DEFENDANT

IN THE CIRCUIT COURT

BALDWINN COUNTY, ALABAMA

AT LAW

CASE NO. \_\_\_\_\_

ANSWER

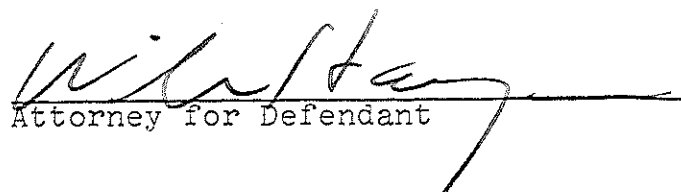
For answer to the Plaintiff's complaint Respondent says  
as follows:

1. The allegations contained therein are untrue.
2. The Defendant for answer to the said complaint sayth  
that she has paid the debt, for the recovery of which this suit  
was brought, before the action was commenced.

FILED

FEB 3 1965

ALICE L. DUCK, CLERK  
REGISTER

  
Attorney for Defendant

TRANSFER

**NOTICE of ~~APPEAL~~**STATE OF ALABAMA, }  
MOBILE COUNTY }THE AMERICAN NATIONAL BANK & TRUSTCOMPANY OF MOBILE, a national banking  
association Plaintiff

VS.

NORMA S. HARTNESS

Defendant

To NORMA S. HARTNESS, the defendant

in said Cause:

You are hereby notified that THE AMERICAN NATIONAL BANK & TRUST COMPANY  
OF MOBILE, a national banking association

the plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama,  
~~an appeal from the judgement therein rendered by~~  
 from the ~~Judge of 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  
Baldwin County  
 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 9 day of April 1963B. V. Adams  
Clerk, Court of General Sessions of Mobile County, Civil Division

TRANSFER

# NOTICE of ~~APPEAL~~

STATE OF ALABAMA, }  
MOBILE COUNTY }

THE AMERICAN NATIONAL BANK & TRUST

COMPANY OF MOBILE, a national banking  
association Plaintiff

VS.

NORMA S. HARTNESS

Defendant

To NORMA S. HARTNESS, the defendant

in said Cause:

You are hereby notified that THE AMERICAN NATIONAL BANK & TRUST COMPANY  
OF MOBILE, a national banking association

the plaintiff in the above entitled cause has prayed and obtained a transfer to the Circuit Court of Baldwin County, Alabama, ~~an appeal from the judgement therein rendered by~~ from the ~~Judge of 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 Baldwin County ~~Mobile County~~, to be held for said County, you are hereby notified accordingly.

Given under my hand this the 9 day of April 1963

*[Signature]*  
Clerk, Court of General Sessions of Mobile County, Civil Division

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WILSON HAYES  
LAWYER  
BAY MINETTE, ALABAMA

P. O. Box 268

Telephone 937-2171

March 27, 1963

Mr. G. V. Adams  
Clerk of the Court of  
General Sessions  
Mobile County  
Mobile, Alabama

Dear Mr. Adams:

Please file the enclosed Plea in Abatement and forward the copy to Attorneys Hamilton, Denniston, Butler & Riddick.

Yours very truly,

  
Wilson Hayes

WH/rkh  
Encl: 2

7/28

Case No. 27612

THE AMERICAN NATIONAL BANK & TRUST COMPANY  
OF MOBILE, a national Banking Association

Plaintiff,

VS

NORMA S. HARTNESS

Defendant.

NOTICE OF AERIAL TRANSFER

Returnable To The Circuit Court of  
Baldwin County

Issued: April 9th, 1963

Serve On: Norma S. Hartness  
P. O. Box 35  
Perdido, Alabama