

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

July 8, 1963

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

Re: Fidelity Acceptance Corporation  
Vs: H. E. Frazier  
At Law No. 5581

Dear Mrs. Duck:

Kindly have the sheriff of Mobile County serve  
summons and complaint on the defendant at Route 5,  
Box 84, Mobile.

Thank you.

Sincerely,

  
James A. Brice

JAB:j

FIDELITY ACCEPTANCE CORPORATION )

PLAINTIFF )

VS )

H. E. FRAZIER )

DEFENDANT )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

no. 5581

The Plaintiff claims of the Defendant the sum of Seven Hundred Seventy-eight and 82/100 (\$778.82) Dollars, due by promissory note made by the Defendant on the 9th day of April 1962, and payable on the 9th day of December, 1962. Interest

The Plaintiff claims of the Defendant the sum of Seven Hundred Seventy-eight and 82/100 (\$778.82) Dollars, due by promissory note made by the Defendant on the 9th day of April 1962, and payable on the 9th day of December 1962.

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 the 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 Fifty (\$150.00) Dollars, as such reasonable attorney's fee.

  
Attorney for Plaintiff

FILED

MAY 23 1963

ALICE J. DUCK, 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 H. E. Frazier

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 -----

-----H. E. Frazier-----, Defendant-----

by -----

-----Fidelity Acceptance Corporation, a corporation,-----, Plaintiff-----

Witness my hand this 23 day of May 1963

Exp-7-16-63

Cliff J. Black, Clerk

lcl  
No. 55-51

3554

Page

**STATE of ALABAMA**

Baldwin County

**CIRCUIT COURT**

Fidelity Acceptance Corporation

a corporation

Plaintiffs

vs.

16/64  
H. E. Frazier

Rt 5 - Box 84

Defendants

**Summons and Complaint**

Filed MAY 28 1963

ALICE J. DUCK

CLERK  
REGISTER

Clerk

Served 28 day of May 1963  
found in my county after diligent search and in-

Taylor Wilkins, Sheriff

W. A. Talbot  
Deputy Sheriff

James A. Brice

Plaintiff's Attorney

**RECEIVED**

Defendant's Attorney

JUL 12 1963

SHERIFF'S OFFICE

Defendant lives at

208 Railroad Street  
Bay Minette, Alabama

Received In Office

July 10, 1963  
May 23, 1963

Sheriff.

I have executed this summons

this July 16 1963  
by leaving a copy with

H. E. Frazier

Ray W. Bridges  
Sheriff.

J. W. Lloyd  
Deputy Sheriff.

FIDELITY ACCEPTANCE CORPORATION

PLAINTIFF

VS

H. E. FRAIZIER

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NO: 5581

.-.-.-.

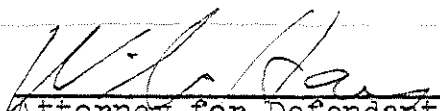
ANSWER

Comes now Defendant and for answer to the Plaintiff's Complaint says as follows:


1. The Defendant for answer to the Complaint, sayth that he is not guilty of the matters alleged therein.

2. The Defendant for answer to the Complaint, sayth that the matters alleged therein are untrue.

3. The Defendant for answer to the said Complaint sayth that he has paid the debt, for the recovery of which this suit was brought, before the action was commenced.

  
Attorney for Defendant

Defendant demands trial by jury, this 2nd day of August, 1963.

  
Attorney for Defendant

FILED

AUG 5 1963

J. DUCK, CLERK  
REGISTER

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

September 10, 1963

P.O. Box 298

WHITEHALL 3-3601

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

Re: Fidelity Acceptance Corp.  
Vs: H. E. Frazier  
At Law, No. 5581

Dear Mrs. Duck:

At the request of and on behalf of the plaintiff, I  
hereby take a non-suit.

This cause was on the Jury Docket for trial Friday,  
September 13, 1963.

Thank you.

Sincerely,

  
James A. Brice

JAB:lgw

cc: Hon. H. M. Hall  
Circuit Judge  
Bay Minette, Alabama  
cc: Wilson Hayes, Esq.  
Bay Minette, Alabama